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10 Attorneys for Defendant
11 INTELIUS INC.

12 UNITED STATES DISTRICT COURT
13 FOR THE CENTRAL DISTRICT OF CALIFORNIA
14 SOUTHERN DIVISION

15 LISA LIBERI, et al.,
16 Plaintiffs,
17 v.
18 ORLY TAITZ, et al.,
19 Defendants.
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Case No. 8:11-CV-00485-AG
(AJWx)

Assigned for all purposes to
Honorable Andrew J. Guilford

**DEFENDANT INTELIUS INC.'S
ANSWER AND AFFIRMATIVE
DEFENSES TO PLAINTIFFS'
FIRST AMENDED COMPLAINT**

1 For itself and no other party, Defendant Intelius Inc. (“Intelius”) hereby
2 responds to the First Amended Complaint (“Complaint”) of Lisa Liberi, *et. al.* as
3 follows:

4 **ANSWER TO ALLEGATIONS RE: NATURE OF ACTION**

5 1. In response to Paragraph 1 of the Complaint, Intelius states that the
6 allegations contained in Paragraph 1 are legal conclusions and/or argument not
7 subject to admission or denial. To the extent that Paragraph 1 contains allegations
8 requiring admission or denial, Intelius denies that Plaintiffs are entitled to the relief
9 requested in the Complaint, or any relief whatsoever. Intelius states that it is
10 without knowledge or information sufficient to form a belief as to the truth or
11 falsity of the allegations of Paragraph 1, referring to any other defendant and, on
12 that basis, denies each and every remaining allegation contained in Paragraph 1.

13 **ANSWER TO ALLEGATIONS RE: JURISDICTION AND VENUE**

14 2. In response to Paragraph 2 of the Complaint, Intelius states that the
15 allegations contained in Paragraph 2 are legal conclusions and/or argument not
16 subject to admission or denial. To the extent that Paragraph 2 contains allegations
17 requiring admission or denial, Intelius admits that this Court has original
18 jurisdiction over this matter under 28 U.S.C. § 1331. Intelius also admits that this
19 Court has original jurisdiction over this matter, under 28 U.S.C. § 1332, in that it is
20 a civil action between citizens of different states in which the matter in controversy
21 allegedly exceeds the sum or value of seventy-five thousand dollars (\$75,000),
22 exclusive of interest and costs. Intelius further states that the First, Second, Third,
23 Fifth, Sixth, Eighth, Ninth, Seventeenth, Eighteenth, Nineteenth, and Twentieth
24 Causes of Action against Intelius have been dismissed with prejudice. Intelius
25 states that it is without knowledge or information sufficient to form a belief as to
26 the truth or falsity of the allegations of Paragraph 2, referring to any other defendant
27 and, on that basis, denies each and every remaining allegation contained in
28 Paragraph 2.

1 3. In response to Paragraph 3 of the Complaint, Intelius states that the
2 allegations contained in Paragraph 3 are legal conclusions and/or argument not
3 subject to admission or denial. To the extent that Paragraph 3 contains allegations
4 requiring admission or denial, Intelius states that it is without knowledge or
5 information sufficient to form a belief as to the truth or falsity of the allegations of
6 Paragraph 3, referring to any other defendant and, on that basis, denies each such
7 allegation. Intelius admits that venue is proper in the Central District of California
8 under 28 U.S.C. § 1391. Intelius states that it is without knowledge or information
9 sufficient to form a belief as to the truth or falsity of the allegations of Paragraph 3,
10 referring to any other defendant and, on that basis, denies each and every remaining
11 allegation contained in Paragraph 3.

12 **ANSWER TO ALLEGATIONS RE: PARTIES**

13 4. In response to Paragraph 4 of the Complaint, Intelius states that it is
14 without knowledge or information sufficient to form a belief as to the truth or
15 falsity of the allegations of Paragraph 4 and, on that basis, denies each and every
16 allegation contained in Paragraph 4.

17 5. In response to Paragraph 5 of the Complaint, Intelius states that it is
18 without knowledge or information sufficient to form a belief as to the truth or
19 falsity of the allegations of Paragraph 5 and, on that basis, denies each and every
20 allegation contained in Paragraph 5.

21 6. In response to Paragraph 6 of the Complaint, Intelius states that it is
22 without knowledge or information sufficient to form a belief as to the truth or
23 falsity of the allegations of Paragraph 6 and, on that basis, denies each and every
24 allegation contained in Paragraph 6.

25 7. In response to Paragraph 7 of the Complaint, Intelius states that it is
26 without knowledge or information sufficient to form a belief as to the truth or
27 falsity of the allegations of Paragraph 7 and, on that basis denies each and every
28 allegation contained in Paragraph 7.

1 8. In response to Paragraph 8 of the Complaint, Intelius states that it is
2 without knowledge or information sufficient to form a belief as to the truth or
3 falsity of the allegations of Paragraph 8 and, on that basis, denies each and every
4 allegation contained in Paragraph 8.

5 9. In response to Paragraph 9 of the Complaint, Intelius states that it is
6 without knowledge or information sufficient to form a belief as to the truth or
7 falsity of the allegations of Paragraph 9 and, on that basis, denies each and every
8 allegation contained in Paragraph 9.

9 10. In response to Paragraph 10 of the Complaint, Intelius states that it is
10 without knowledge or information sufficient to form a belief as to the truth or
11 falsity of the allegations of Paragraph 10 and, on that basis, denies each and every
12 allegation contained in Paragraph 10.

13 11. In response to Paragraph 11 of the Complaint, Intelius states that it is
14 without knowledge or information sufficient to form a belief as to the truth or
15 falsity of the allegations of Paragraph 11 and, on that basis denies each and every
16 allegation contained in Paragraph 11.

17 12. In response to Paragraph 12 of the Complaint, Intelius states that it is
18 without knowledge or information sufficient to form a belief as to the truth or
19 falsity of the allegations of Paragraph 12 and, on that basis, denies each and every
20 allegation contained in Paragraph 12.

21 13. In response to Paragraph 13 of the Complaint, Intelius states that it is
22 without knowledge or information sufficient to form a belief as to the truth or
23 falsity of the allegations of Paragraph 13 and, on that basis, denies each and every
24 allegation contained in Paragraph 13.

25 14. In response to Paragraph 14 of the Complaint, Intelius states that it is
26 without knowledge or information sufficient to form a belief as to the truth or
27 falsity of the allegations of Paragraph 14 and, on that basis, denies each and every
28 allegation contained in Paragraph 14.

1 15. In response to Paragraph 15 of the Complaint, Intelius states that it is
2 without knowledge or information sufficient to form a belief as to the truth or
3 falsity of the allegations of Paragraph 15 and, on that basis, denies each and every
4 allegation contained in Paragraph 15.

5 16. In response to Paragraph 16 of the Complaint, Intelius states that it is
6 without knowledge or information sufficient to form a belief as to the truth or
7 falsity of the allegations of Paragraph 16 and, on that basis, denies each and every
8 allegation contained in Paragraph 16.

9 17. In response to Paragraph 17 of the Complaint, Intelius states that the
10 allegations contained in Paragraph 17 of the Complaint are legal conclusions and/or
11 argument and are not subject to admission or denial. To the extent that Paragraph
12 17 contains allegations requiring admission or denial, Intelius states that it is
13 without knowledge or information sufficient to form a belief as to the truth or
14 falsity of the allegations of Paragraph 17 and, on that basis, denies each and every
15 remaining allegation contained in Paragraph 17.

16 18. In response to Paragraph 18 of the Complaint, Intelius states that the
17 allegations contained in Paragraph 18 of the Complaint are legal conclusions and/or
18 argument and are not subject to admission or denial. To the extent that Paragraph
19 18 contains allegations requiring admission or denial, Intelius states that it is
20 without knowledge or information sufficient to form a belief as to the truth or
21 falsity of the allegations of Paragraph 18 and, on that basis, denies each and every
22 remaining allegation contained in Paragraph 18.

23 19. In response to Paragraph 19 of the Complaint, Intelius states that the
24 allegations contained in Paragraph 19 of the Complaint are legal conclusions and/or
25 argument and are not subject to admission or denial. To the extent that Paragraph
26 19 contains allegations requiring admission or denial, Intelius states that it is
27 without knowledge or information sufficient to form a belief as to the truth or
28 falsity of the allegations of Paragraph 19 and, on that basis, denies each and every

1 remaining allegation contained in Paragraph 19.

2 20. In response to Paragraph 20 of the Complaint, Intelius states that the
3 allegations contained in Paragraph 20 of the Complaint are legal conclusions and/or
4 argument and are not subject to admission or denial. To the extent that Paragraph
5 20 contains allegations requiring admission or denial, Intelius states that it is
6 without knowledge or information sufficient to form a belief as to the truth or
7 falsity of the allegations of Paragraph 20 and, on that basis, denies each and every
8 remaining allegation contained in Paragraph 20.

9 21. In response to Paragraph 21 of the Complaint, Intelius states that the
10 allegations contained in Paragraph 21 of the Complaint are legal conclusions and/or
11 argument and are not subject to admission or denial. To the extent that Paragraph
12 21 contains allegations requiring admission or denial, Intelius states that it is
13 without knowledge or information sufficient to form a belief as to the truth or
14 falsity of the allegations of Paragraph 21 and, on that basis, denies each and every
15 remaining allegation contained in Paragraph 21.

16 22. In response to Paragraph 22 of the Complaint, Intelius states that the
17 allegations contained in Paragraph 22 of the Complaint are legal conclusions and/or
18 argument and are not subject to admission or denial. To the extent that Paragraph
19 22 contains allegations requiring admission or denial, Intelius states that it is
20 without knowledge or information sufficient to form a belief as to the truth or
21 falsity of the allegations of Paragraph 22 and, on that basis, denies each and every
22 remaining allegation contained in Paragraph 22.

23 23. In response to Paragraph 23 of the Complaint, Intelius states that the
24 allegations contained in Paragraph 23 of the Complaint are legal conclusions and/or
25 argument and are not subject to admission or denial. To the extent that Paragraph
26 23 contains allegations requiring admission or denial, Intelius states that it is
27 without knowledge or information sufficient to form a belief as to the truth or
28 falsity of the allegations of Paragraph 23 and, on that basis, denies each and every

1 remaining allegation contained in Paragraph 23.

2 24. In response to Paragraph 24 of the Complaint, Intelius states that the
3 allegations contained in Paragraph 24 of the Complaint are legal conclusions and/or
4 argument and are not subject to admission or denial. To the extent that Paragraph
5 24 contains allegations requiring admission or denial, Intelius admits that it is a
6 corporation organized under the laws of Washington. Intelius further admits that it
7 conducts business in the County of Los Angeles, California, and other counties
8 throughout the United States. Intelius denies that it acted as a “consumer reporting
9 agency” as defined in the Fair Credit Reporting Act or the California Credit
10 Reporting Agencies Act as to any of the plaintiffs. Intelius further denies that it
11 acted as an “Investigative Consumer Reporting Agency” as defined in the
12 Investigative Consumer Reporting Agencies Act as to any of the plaintiffs. Except
13 as expressly so admitted or denied, Intelius denies each and every allegation
14 contained in Paragraph 24.

15 25. In response to Paragraph 25 of the Complaint, Intelius states that it is
16 without knowledge or information sufficient to form a belief as to the truth or
17 falsity of the allegations of Paragraph 25 and, on that basis, denies each and every
18 allegation contained in Paragraph 25.

19 26. In response to Paragraph 26 of the Complaint, Intelius states that it is
20 without knowledge or information sufficient to form a belief as to the truth or
21 falsity of the allegations of Paragraph 26 and, on that basis, denies each and every
22 allegation contained in Paragraph 26.

23 27. In response to Paragraph 27 of the Complaint, Intelius states that it is
24 without knowledge or information sufficient to form a belief as to the truth or
25 falsity of the allegations of Paragraph 27 and, on that basis, denies each and every
26 allegation contained in Paragraph 27.

27 28. In response to Paragraph 28 of the Complaint, Intelius states that the
28 allegations contained in Paragraph 28 of the Complaint are legal conclusions and/or

1 argument and are not subject to admission or denial. To the extent that Paragraph
 2 28 contains allegations requiring admission or denial, Intelius states that it is
 3 without knowledge or information sufficient to form a belief as to the truth or
 4 falsity of the allegations of Paragraph 28 and, on that basis, denies each and every
 5 allegation contained in Paragraph 28.

6 **ANSWER TO ALLEGATIONS RE: NAMING OF “DOE” DEFENDANTS**

7 29. In response to Paragraph 29 of the Complaint, Intelius states that it is
 8 without knowledge or information sufficient to form a belief as to the truth or
 9 falsity of the allegations of Paragraph 29 and, on that basis, denies each and every
 10 allegation contained in Paragraph 29.

11 **ANSWER TO ALLEGATIONS RE: FACTUAL ALLEGATIONS**
 12 **PERTAINING TO DEFENDANTS ORLY TAITZ, LAW OFFICES OF**
 13 **ORLY TAITZ, ORLY TAITZ, INC., DEFEND OUR FREEDOMS**
 14 **FOUNDATIONS, INC., NEIL SANKEY, TODD SANKEY, SANKEY**
 15 **INVESTIGATION AND THE SANKEY FIRM, INC.**

16 30. In response to Paragraph 30 of the Complaint, Intelius states that it is
 17 without knowledge or information sufficient to form a belief as to the truth or
 18 falsity of the allegations of Paragraph 30, referring to any other defendant and, on
 19 that basis, denies each and every allegation contained in Paragraph 30.

20 31. In response to Paragraph 31 of the Complaint, Intelius states that the
 21 allegations contained in Paragraph 31 of the Complaint are legal conclusions and/or
 22 argument and are not subject to admission or denial. To the extent that Paragraph
 23 31 contains allegations requiring admission or denial, Intelius denies that the
 24 Sankey Defendants performed searches through Intelius on plaintiffs Liberi or
 25 Ostella. Intelius states that it is without knowledge or information sufficient to
 26 form a belief as to the truth or falsity of the allegations of Paragraph 31, referring to
 27 any other defendant and, on that basis, denies each and every remaining allegation
 28 contained in Paragraph 31.

32. In response to Paragraph 32 of the Complaint, Intelius admits that Lisa
 Liberi never worked for Intelius. Intelius states that it is without knowledge or

1 information sufficient to form a belief as to the truth or falsity of the allegations of
2 Paragraph 32, referring to any other defendant and, on that basis, denies each and
3 every allegation contained in Paragraph 32.

4 33. In response to Paragraph 33 of the Complaint, Intelius states that it is
5 without knowledge or information sufficient to form a belief as to the truth or
6 falsity of the allegations of Paragraph 33, and on that basis, denies each and every
7 allegation contained in Paragraph 33.

8 34. In response to Paragraph 34 of the Complaint, Intelius states that it is
9 without knowledge or information sufficient to form a belief as to the truth or
10 falsity of the allegations of Paragraph 34, and on that basis, denies each and every
11 allegation contained in Paragraph 34.

12 35. In response to Paragraph 35 of the Complaint, Intelius states that it is
13 without knowledge or information sufficient to form a belief as to the truth or
14 falsity of the allegations of Paragraph 35, and on that basis, denies each and every
15 allegation contained in Paragraph 35.

16 36. In response to Paragraph 36 of the Complaint, Intelius states that it is
17 without knowledge or information sufficient to form a belief as to the truth or
18 falsity of the allegations of Paragraph 36, and on that basis, denies each and every
19 allegation contained in Paragraph 36.

20 37. In response to Paragraph 37 of the Complaint, Intelius states that it is
21 without knowledge or information sufficient to form a belief as to the truth or
22 falsity of the allegations of Paragraph 37, referring to any other defendant and, on
23 that basis, denies each and every allegation contained in Paragraph 37.

24 38. In response to Paragraph 38 of the Complaint, Intelius states that it is
25 without knowledge or information sufficient to form a belief as to the truth or
26 falsity of the allegations of Paragraph 38, and on that basis, denies each and every
27 allegation contained in Paragraph 38.

28 39. In response to Paragraph 39 of the Complaint, Intelius states that it is

1 without knowledge or information sufficient to form a belief as to the truth or
2 falsity of the allegations of Paragraph 39, and on that basis, denies each and every
3 allegation contained in Paragraph 39.

4 40. In response to Paragraph 40 of the Complaint, Intelius states that it is
5 without knowledge or information sufficient to form a belief as to the truth or
6 falsity of the allegations of Paragraph 40, and on that basis, denies each and every
7 allegation contained in Paragraph 40.

8 41. In response to Paragraph 41 of the Complaint, Intelius states that it is
9 without knowledge or information sufficient to form a belief as to the truth or
10 falsity of the allegations of Paragraph 41, and on that basis, denies each and every
11 allegation contained in Paragraph 41.

12 42. In response to Paragraph 42 of the Complaint, Intelius states that it is
13 without knowledge or information sufficient to form a belief as to the truth or
14 falsity of the allegations of Paragraph 42, and on that basis, denies each and every
15 allegation contained in Paragraph 42.

16 43. In response to Paragraph 43 of the Complaint, Intelius states that it is
17 without knowledge or information sufficient to form a belief as to the truth or
18 falsity of the allegations of Paragraph 43, and on that basis, denies each and every
19 allegation contained in Paragraph 43.

20 44. In response to Paragraph 44 of the Complaint, Intelius states that it is
21 without knowledge or information sufficient to form a belief as to the truth or
22 falsity of the allegations of Paragraph 44, and on that basis, denies each and every
23 allegation contained in Paragraph 44.

24 45. In response to Paragraph 45 of the Complaint, Intelius states that it is
25 without knowledge or information sufficient to form a belief as to the truth or
26 falsity of the allegations of Paragraph 45, and on that basis, denies each and every
27 allegation contained in Paragraph 45.

28 46. In response to Paragraph 46 of the Complaint, Intelius states that it is

1 without knowledge or information sufficient to form a belief as to the truth or
2 falsity of the allegations of Paragraph 46, and on that basis, denies each and every
3 allegation contained in Paragraph 46.

4 47. In response to Paragraph 47 of the Complaint, Intelius states that it is
5 without knowledge or information sufficient to form a belief as to the truth or
6 falsity of the allegations of Paragraph 47, and on that basis, denies each and every
7 allegation contained in Paragraph 47.

8 48. In response to Paragraph 48 of the Complaint, Intelius states that it is
9 without knowledge or information sufficient to form a belief as to the truth or
10 falsity of the allegations of Paragraph 48, and on that basis, denies each and every
11 allegation contained in Paragraph 48.

12 49. In response to Paragraph 49 of the Complaint, Intelius states that it is
13 without knowledge or information sufficient to form a belief as to the truth or
14 falsity of the allegations of Paragraph 49, and on that basis, denies each and every
15 allegation contained in Paragraph 49.

16 50. In response to Paragraph 50 of the Complaint, Intelius states that it is
17 without knowledge or information sufficient to form a belief as to the truth or
18 falsity of the allegations of Paragraph 50, and on that basis, denies each and every
19 allegation contained in Paragraph 50.

20 51. In response to Paragraph 51 of the Complaint, Intelius states that it is
21 without knowledge or information sufficient to form a belief as to the truth or
22 falsity of the allegations of Paragraph 51, and on that basis, denies each and every
23 allegation contained in Paragraph 51.

24 52. In response to Paragraph 52 of the Complaint, Intelius states that it is
25 without knowledge or information sufficient to form a belief as to the truth or
26 falsity of the allegations of Paragraph 52, and on that basis, denies each and every
27 allegation contained in Paragraph 52.

28 53. In response to Paragraph 53 of the Complaint, Intelius states that it is

1 without knowledge or information sufficient to form a belief as to the truth or
2 falsity of the allegations of Paragraph 53, and on that basis, denies each and every
3 allegation contained in Paragraph 53.

4 54. In response to Paragraph 54 of the Complaint, Intelius states that it is
5 without knowledge or information sufficient to form a belief as to the truth or
6 falsity of the allegations of Paragraph 54, and on that basis, denies each and every
7 allegation contained in Paragraph 54.

8 55. In response to Paragraph 55 of the Complaint, Intelius states that it is
9 without knowledge or information sufficient to form a belief as to the truth or
10 falsity of the allegations of Paragraph 55, and on that basis, denies each and every
11 allegation contained in Paragraph 55.

12 56. In response to Paragraph 56 of the Complaint, Intelius states that it is
13 without knowledge or information sufficient to form a belief as to the truth or
14 falsity of the allegations of Paragraph 56, and on that basis, denies each and every
15 allegation contained in Paragraph 56.

16 57. In response to Paragraph 57 of the Complaint, Intelius states that it is
17 without knowledge or information sufficient to form a belief as to the truth or
18 falsity of the allegations of Paragraph 57, and on that basis, denies each and every
19 allegation contained in Paragraph 57.

20 58. In response to Paragraph 58 of the Complaint, Intelius states that it is
21 without knowledge or information sufficient to form a belief as to the truth or
22 falsity of the allegations of Paragraph 58, and on that basis, denies each and every
23 allegation contained in Paragraph 58.

24 59. In response to Paragraph 59 of the Complaint, Intelius states that it is
25 without knowledge or information sufficient to form a belief as to the truth or
26 falsity of the allegations of Paragraph 59, and on that basis, denies each and every
27 allegation contained in Paragraph 59.

28 60. In response to Paragraph 60 of the Complaint, Intelius states that it is

1 without knowledge or information sufficient to form a belief as to the truth or
2 falsity of the allegations of Paragraph 60, and on that basis, denies each and every
3 allegation contained in Paragraph 60.

4 61. In response to Paragraph 61 of the Complaint, Intelius states that it is
5 without knowledge or information sufficient to form a belief as to the truth or
6 falsity of the allegations of Paragraph 61, and on that basis, denies each and every
7 allegation contained in Paragraph 61.

8 62. In response to Paragraph 62 of the Complaint, Intelius states that it is
9 without knowledge or information sufficient to form a belief as to the truth or
10 falsity of the allegations of Paragraph 62, and on that basis, denies each and every
11 allegation contained in Paragraph 62.

12 63. In response to Paragraph 63 of the Complaint, Intelius states that it is
13 without knowledge or information sufficient to form a belief as to the truth or
14 falsity of the allegations of Paragraph 63, and on that basis, denies each and every
15 allegation contained in Paragraph 63.

16 64. In response to Paragraph 64 of the Complaint, Intelius states that it is
17 without knowledge or information sufficient to form a belief as to the truth or
18 falsity of the allegations of Paragraph 64, and on that basis, denies each and every
19 allegation contained in Paragraph 64.

20 65. In response to Paragraph 65 of the Complaint, Intelius states that it is
21 without knowledge or information sufficient to form a belief as to the truth or
22 falsity of the allegations of Paragraph 65, and on that basis, denies each and every
23 allegation contained in Paragraph 65.

24 66. In response to Paragraph 66 of the Complaint, Intelius states that the
25 allegations contained in Paragraph 66 of the Complaint are legal conclusions and/or
26 argument and are not subject to admission or denial. To the extent that Paragraph
27 66 contains allegations requiring admission or denial, Intelius denies that the
28 Sankey Defendants performed searches through Intelius on plaintiffs Liberi or

1 Ostella. Intelius states that it is without knowledge or information sufficient to
2 form a belief as to the truth or falsity of the allegations of Paragraph 66, referring to
3 any other defendant and, on that basis, denies each and every remaining allegation
4 contained in Paragraph 66.

5 67. In response to Paragraph 67 of the Complaint, Intelius denies that the
6 Sankey Defendants performed searches through Intelius on plaintiffs Liberi or
7 Ostella. Intelius states that it is without knowledge or information sufficient to
8 form a belief as to the truth or falsity of the allegations of Paragraph 67, referring to
9 any other defendant and, on that basis, denies each and every remaining allegation
10 contained in Paragraph 67.

11 68. In response to Paragraph 68 of the Complaint, Intelius states that it is
12 without knowledge or information sufficient to form a belief as to the truth or
13 falsity of the allegations of Paragraph 68, and on that basis, denies each and every
14 allegation contained in Paragraph 68.

15 69. In response to Paragraph 69 of the Complaint, Intelius states that it is
16 without knowledge or information sufficient to form a belief as to the truth or
17 falsity of the allegations of Paragraph 69, and on that basis, denies each and every
18 allegation contained in Paragraph 69.

19 70. In response to Paragraph 70 of the Complaint, Intelius denies that it
20 provided Orly Taitz with "Liberi and Ostella's private data[.]" Intelius states that it
21 is without knowledge or information sufficient to form a belief as to the truth or
22 falsity of the allegations of Paragraph 70, referring to any other defendant and, on
23 that basis, denies each and every remaining allegation contained in Paragraph 70.

24 71. In response to Paragraph 71 of the Complaint, Intelius states that it is
25 without knowledge or information sufficient to form a belief as to the truth or
26 falsity of the allegations of Paragraph 71, and on that basis, denies each and every
27 allegation contained in Paragraph 71.

28 72. In response to Paragraph 72 of the Complaint, Intelius states that it is

1 without knowledge or information sufficient to form a belief as to the truth or
2 falsity of the allegations of Paragraph 72, and on that basis, denies each and every
3 allegation contained in Paragraph 72.

4 73. In response to Paragraph 73 of the Complaint, Intelius states that it is
5 without knowledge or information sufficient to form a belief as to the truth or
6 falsity of the allegations of Paragraph 73, and on that basis, denies each and every
7 allegation contained in Paragraph 73.

8 74. In response to Paragraph 74 of the Complaint, Intelius states that it is
9 without knowledge or information sufficient to form a belief as to the truth or
10 falsity of the allegations of Paragraph 74, and on that basis, denies each and every
11 allegation contained in Paragraph 74.

12 75. In response to Paragraph 75 of the Complaint, Intelius states that it is
13 without knowledge or information sufficient to form a belief as to the truth or
14 falsity of the allegations of Paragraph 75, and on that basis, denies each and every
15 allegation contained in Paragraph 75.

16 76. In response to Paragraph 76 of the Complaint, Intelius states that it is
17 without knowledge or information sufficient to form a belief as to the truth or
18 falsity of the allegations of Paragraph 76, and on that basis, denies each and every
19 allegation contained in Paragraph 76.

20 77. In response to Paragraph 77 of the Complaint, Intelius states that it is
21 without knowledge or information sufficient to form a belief as to the truth or
22 falsity of the allegations of Paragraph 77, and on that basis, denies each and every
23 allegation contained in Paragraph 77.

24 78. In response to Paragraph 78 of the Complaint, Intelius states that it is
25 without knowledge or information sufficient to form a belief as to the truth or
26 falsity of the allegations of Paragraph 78, and on that basis, denies each and every
27 allegation contained in Paragraph 78.

28 79. In response to Paragraph 79 of the Complaint, Intelius states that it is

1 without knowledge or information sufficient to form a belief as to the truth or
2 falsity of the allegations of Paragraph 79, and on that basis, denies each and every
3 allegation contained in Paragraph 79.

4 80. In response to Paragraph 80 of the Complaint, Intelius states that it is
5 without knowledge or information sufficient to form a belief as to the truth or
6 falsity of the allegations of Paragraph 80, and on that basis, denies each and every
7 allegation contained in Paragraph 80.

8 81. In response to Paragraph 81 of the Complaint, Intelius states that it is
9 without knowledge or information sufficient to form a belief as to the truth or
10 falsity of the allegations of Paragraph 81, and on that basis, denies each and every
11 allegation contained in Paragraph 81.

12 82. In response to Paragraph 82 of the Complaint, Intelius states that it is
13 without knowledge or information sufficient to form a belief as to the truth or
14 falsity of the allegations of Paragraph 82, and on that basis, denies each and every
15 allegation contained in Paragraph 82.

16 83. In response to Paragraph 83 of the Complaint, Intelius states that it is
17 without knowledge or information sufficient to form a belief as to the truth or
18 falsity of the allegations of Paragraph 83, and on that basis, denies each and every
19 allegation contained in Paragraph 83.

20 84. In response to Paragraph 84 of the Complaint, Intelius states that it is
21 without knowledge or information sufficient to form a belief as to the truth or
22 falsity of the allegations of Paragraph 84, and on that basis, denies each and every
23 allegation contained in Paragraph 84.

24 85. In response to Paragraph 85 of the Complaint, Intelius states that it is
25 without knowledge or information sufficient to form a belief as to the truth or
26 falsity of the allegations of Paragraph 85, and on that basis, denies each and every
27 allegation contained in Paragraph 85.

28 86. In response to Paragraph 86 of the Complaint, Intelius states that it is

1 without knowledge or information sufficient to form a belief as to the truth or
2 falsity of the allegations of Paragraph 86, and on that basis, denies each and every
3 allegation contained in Paragraph 86.

4 87. In response to Paragraph 87 of the Complaint, Intelius states that it is
5 without knowledge or information sufficient to form a belief as to the truth or
6 falsity of the allegations of Paragraph 87, and on that basis, denies each and every
7 allegation contained in Paragraph 87.

8 88. In response to Paragraph 88 of the Complaint, Intelius states that it is
9 without knowledge or information sufficient to form a belief as to the truth or
10 falsity of the allegations of Paragraph 88, and on that basis, denies each and every
11 allegation contained in Paragraph 88.

12 89. In response to Paragraph 89 of the Complaint, Intelius states that it is
13 without knowledge or information sufficient to form a belief as to the truth or
14 falsity of the allegations of Paragraph 89, and on that basis, denies each and every
15 allegation contained in Paragraph 89.

16 90. In response to Paragraph 90 of the Complaint, Intelius states that it is
17 without knowledge or information sufficient to form a belief as to the truth or
18 falsity of the allegations of Paragraph 90, and on that basis, denies each and every
19 allegation contained in Paragraph 90.

20 91. In response to Paragraph 91 of the Complaint, Intelius states that it is
21 without knowledge or information sufficient to form a belief as to the truth or
22 falsity of the allegations of Paragraph 91, and on that basis, denies each and every
23 allegation contained in Paragraph 91.

24 92. In response to Paragraph 92 of the Complaint, Intelius states that it is
25 without knowledge or information sufficient to form a belief as to the truth or
26 falsity of the allegations of Paragraph 92, and on that basis, denies each and every
27 allegation contained in Paragraph 92.

28 93. In response to Paragraph 93 of the Complaint, Intelius states that it is

1 without knowledge or information sufficient to form a belief as to the truth or
2 falsity of the allegations of Paragraph 93, and on that basis, denies each and every
3 allegation contained in Paragraph 93.

4 94. In response to Paragraph 94 of the Complaint, Intelius states that it is
5 without knowledge or information sufficient to form a belief as to the truth or
6 falsity of the allegations of Paragraph 94, and on that basis, denies each and every
7 allegation contained in Paragraph 94.

8 95. In response to Paragraph 95 of the Complaint, Intelius states that it is
9 without knowledge or information sufficient to form a belief as to the truth or
10 falsity of the allegations of Paragraph 95, and on that basis, denies each and every
11 allegation contained in Paragraph 95.

12 96. In response to Paragraph 96 of the Complaint, Intelius states that it is
13 without knowledge or information sufficient to form a belief as to the truth or
14 falsity of the allegations of Paragraph 96, and on that basis, denies each and every
15 allegation contained in Paragraph 96.

16 97. In response to Paragraph 97 of the Complaint, Intelius states that it is
17 without knowledge or information sufficient to form a belief as to the truth or
18 falsity of the allegations of Paragraph 97, and on that basis, denies each and every
19 allegation contained in Paragraph 97.

20 98. In response to Paragraph 98 of the Complaint, Intelius states that it is
21 without knowledge or information sufficient to form a belief as to the truth or
22 falsity of the allegations of Paragraph 98, and on that basis, denies each and every
23 allegation contained in Paragraph 98.

24 99. In response to Paragraph 99 of the Complaint, Intelius states that it is
25 without knowledge or information sufficient to form a belief as to the truth or
26 falsity of the allegations of Paragraph 99, and on that basis, denies each and every
27 allegation contained in Paragraph 99.

28 100. In response to Paragraph 100 of the Complaint, Intelius states that it is

1 without knowledge or information sufficient to form a belief as to the truth or
2 falsity of the allegations of Paragraph 100, and on that basis, denies each and every
3 allegation contained in Paragraph 100.

4 101. In response to Paragraph 101 of the Complaint, Intelius states that it is
5 without knowledge or information sufficient to form a belief as to the truth or
6 falsity of the allegations of Paragraph 101, and on that basis, denies each and every
7 allegation contained in Paragraph 101.

8 102. In response to Paragraph 102 of the Complaint, Intelius states that it is
9 without knowledge or information sufficient to form a belief as to the truth or
10 falsity of the allegations of Paragraph 102, and on that basis, denies each and every
11 allegation contained in Paragraph 102.

12 103. In response to Paragraph 103 of the Complaint, Intelius states that it is
13 without knowledge or information sufficient to form a belief as to the truth or
14 falsity of the allegations of Paragraph 103, and on that basis, denies each and every
15 allegation contained in Paragraph 103.

16 104. In response to Paragraph 104 of the Complaint, Intelius states that it is
17 without knowledge or information sufficient to form a belief as to the truth or
18 falsity of the allegations of Paragraph 104, and on that basis, denies each and every
19 allegation contained in Paragraph 104.

20 105. In response to Paragraph 105 of the Complaint, Intelius states that it is
21 without knowledge or information sufficient to form a belief as to the truth or
22 falsity of the allegations of Paragraph 105, and on that basis, denies each and every
23 allegation contained in Paragraph 105.

24 106. In response to Paragraph 106 of the Complaint, Intelius states that it is
25 without knowledge or information sufficient to form a belief as to the truth or
26 falsity of the allegations of Paragraph 106, and on that basis, denies each and every
27 allegation contained in Paragraph 106.

28 107. In response to Paragraph 107 of the Complaint, Intelius states that it is

1 without knowledge or information sufficient to form a belief as to the truth or
2 falsity of the allegations of Paragraph 107, and on that basis, denies each and every
3 allegation contained in Paragraph 107.

4 108. In response to Paragraph 108 of the Complaint, Intelius states that it is
5 without knowledge or information sufficient to form a belief as to the truth or
6 falsity of the allegations of Paragraph 108, and on that basis, denies each and every
7 allegation contained in Paragraph 108.

8 109. In response to Paragraph 109 of the Complaint, Intelius states that it is
9 without knowledge or information sufficient to form a belief as to the truth or
10 falsity of the allegations of Paragraph 109, and on that basis, denies each and every
11 allegation contained in Paragraph 109.

12 110. In response to Paragraph 110 of the Complaint, Intelius states that it is
13 without knowledge or information sufficient to form a belief as to the truth or
14 falsity of the allegations of Paragraph 110, and on that basis, denies each and every
15 allegation contained in Paragraph 110.

16 111. In response to Paragraph 111 of the Complaint, Intelius states that it is
17 without knowledge or information sufficient to form a belief as to the truth or
18 falsity of the allegations of Paragraph 111, and on that basis, denies each and every
19 allegation contained in Paragraph 111.

20 112. In response to Paragraph 112 of the Complaint, Intelius states that it is
21 without knowledge or information sufficient to form a belief as to the truth or
22 falsity of the allegations of Paragraph 112, and on that basis, denies each and every
23 allegation contained in Paragraph 112.

24 113. In response to Paragraph 113 of the Complaint, Intelius states that it is
25 without knowledge or information sufficient to form a belief as to the truth or
26 falsity of the allegations of Paragraph 113, and on that basis, denies each and every
27 allegation contained in Paragraph 113.

28 114. In response to Paragraph 114 of the Complaint, Intelius states that it is

1 without knowledge or information sufficient to form a belief as to the truth or
2 falsity of the allegations of Paragraph 114, and on that basis, denies each and every
3 allegation contained in Paragraph 114.

4 115. In response to Paragraph 115 of the Complaint, Intelius states that it is
5 without knowledge or information sufficient to form a belief as to the truth or
6 falsity of the allegations of Paragraph 115, and on that basis, denies each and every
7 allegation contained in Paragraph 115.

8 116. In response to Paragraph 116 of the Complaint, Intelius states that it is
9 without knowledge or information sufficient to form a belief as to the truth or
10 falsity of the allegations of Paragraph 116, and on that basis, denies each and every
11 allegation contained in Paragraph 116.

12 117. In response to Paragraph 117 of the Complaint, Intelius states that it is
13 without knowledge or information sufficient to form a belief as to the truth or
14 falsity of the allegations of Paragraph 117, and on that basis, denies each and every
15 allegation contained in Paragraph 117.

16 118. In response to Paragraph 118 of the Complaint, Intelius states that it is
17 without knowledge or information sufficient to form a belief as to the truth or
18 falsity of the allegations of Paragraph 118, and on that basis, denies each and every
19 allegation contained in Paragraph 118.

20 119. In response to Paragraph 119 of the Complaint, Intelius states that the
21 allegations contained in Paragraph 119 of the Complaint are legal conclusions
22 and/or argument and are not subject to admission or denial. To the extent that
23 Paragraph 119 contains allegations requiring admission or denial, Intelius states
24 that it is without knowledge or information sufficient to form a belief as to the truth
25 or falsity of the allegations of Paragraph 119, and on that basis, denies each and
26 every allegation contained in Paragraph 119.

27 120. In response to Paragraph 120 of the Complaint, Intelius states that it is
28 without knowledge or information sufficient to form a belief as to the truth or

1 falsity of the allegations of Paragraph 120, and on that basis, denies each and every
2 allegation contained in Paragraph 120.

3 121. In response to Paragraph 121 of the Complaint, Intelius states that it is
4 without knowledge or information sufficient to form a belief as to the truth or
5 falsity of the allegations of Paragraph 121, and on that basis, denies each and every
6 allegation contained in Paragraph 121.

7 122. In response to Paragraph 122 of the Complaint, Intelius states that it is
8 without knowledge or information sufficient to form a belief as to the truth or
9 falsity of the allegations of Paragraph 122, and on that basis, denies each and every
10 allegation contained in Paragraph 122.

11 123. In response to Paragraph 123 of the Complaint, Intelius states that it is
12 without knowledge or information sufficient to form a belief as to the truth or
13 falsity of the allegations of Paragraph 123, and on that basis, denies each and every
14 allegation contained in Paragraph 123.

15 124. In response to Paragraph 124 of the Complaint, Intelius states that it is
16 without knowledge or information sufficient to form a belief as to the truth or
17 falsity of the allegations of Paragraph 124, and on that basis, denies each and every
18 allegation contained in Paragraph 124.

19 125. In response to Paragraph 125 of the Complaint, Intelius states that it is
20 without knowledge or information sufficient to form a belief as to the truth or
21 falsity of the allegations of Paragraph 125, and on that basis, denies each and every
22 allegation contained in Paragraph 125.

23 126. In response to Paragraph 126 of the Complaint, Intelius states that it is
24 without knowledge or information sufficient to form a belief as to the truth or
25 falsity of the allegations of Paragraph 126, and on that basis, denies each and every
26 allegation contained in Paragraph 126.

27 127. In response to Paragraph 127 of the Complaint, Intelius states that it is
28 without knowledge or information sufficient to form a belief as to the truth or

1 falsity of the allegations of Paragraph 127, and on that basis, denies each and every
2 allegation contained in Paragraph 127.

3 128. In response to Paragraph 128 of the Complaint, Intelius states that it is
4 without knowledge or information sufficient to form a belief as to the truth or
5 falsity of the allegations of Paragraph 128, and on that basis, denies each and every
6 allegation contained in Paragraph 128.

7 129. In response to Paragraph 129 of the Complaint, Intelius states that it is
8 without knowledge or information sufficient to form a belief as to the truth or
9 falsity of the allegations of Paragraph 129, and on that basis, denies each and every
10 allegation contained in Paragraph 129.

11 130. In response to Paragraph 130 of the Complaint, Intelius states that it is
12 without knowledge or information sufficient to form a belief as to the truth or
13 falsity of the allegations of Paragraph 130, and on that basis, denies each and every
14 allegation contained in Paragraph 130.

15 131. In response to Paragraph 131 of the Complaint, Intelius states that it is
16 without knowledge or information sufficient to form a belief as to the truth or
17 falsity of the allegations of Paragraph 131, and on that basis, denies each and every
18 allegation contained in Paragraph 131.

19 132. In response to Paragraph 132 of the Complaint, Intelius states that it is
20 without knowledge or information sufficient to form a belief as to the truth or
21 falsity of the allegations of Paragraph 132, and on that basis, denies each and every
22 allegation contained in Paragraph 132.

23 133. In response to Paragraph 133 of the Complaint, Intelius states that it is
24 without knowledge or information sufficient to form a belief as to the truth or
25 falsity of the allegations of Paragraph 133, and on that basis, denies each and every
26 allegation contained in Paragraph 133.

27 134. In response to Paragraph 134 of the Complaint, Intelius states that it is
28 without knowledge or information sufficient to form a belief as to the truth or

1 falsity of the allegations of Paragraph 134, and on that basis, denies each and every
2 allegation contained in Paragraph 134.

3 135. In response to Paragraph 135 of the Complaint, Intelius states that it is
4 without knowledge or information sufficient to form a belief as to the truth or
5 falsity of the allegations of Paragraph 135, and on that basis, denies each and every
6 allegation contained in Paragraph 135.

7 136. In response to Paragraph 136 of the Complaint, Intelius states that it is
8 without knowledge or information sufficient to form a belief as to the truth or
9 falsity of the allegations of Paragraph 136, and on that basis, denies each and every
10 allegation contained in Paragraph 136.

11 137. In response to Paragraph 137 of the Complaint, Intelius states that it is
12 without knowledge or information sufficient to form a belief as to the truth or
13 falsity of the allegations of Paragraph 137, and on that basis, denies each and every
14 allegation contained in Paragraph 137.

15 138. In response to Paragraph 138 of the Complaint, Intelius states that it is
16 without knowledge or information sufficient to form a belief as to the truth or
17 falsity of the allegations of Paragraph 138, and on that basis, denies each and every
18 allegation contained in Paragraph 138.

19 139. In response to Paragraph 139 of the Complaint, Intelius states that it is
20 without knowledge or information sufficient to form a belief as to the truth or
21 falsity of the allegations of Paragraph 139, and on that basis, denies each and every
22 allegation contained in Paragraph 139.

23 140. In response to Paragraph 140 of the Complaint, Intelius states that it is
24 without knowledge or information sufficient to form a belief as to the truth or
25 falsity of the allegations of Paragraph 140, and on that basis, denies each and every
26 allegation contained in Paragraph 140.

27 141. In response to Paragraph 141 of the Complaint, Intelius states that it is
28 without knowledge or information sufficient to form a belief as to the truth or

1 falsity of the allegations of Paragraph 141, and on that basis, denies each and every
2 allegation contained in Paragraph 141.

3 142. In response to Paragraph 142 of the Complaint, Intelius states that it is
4 without knowledge or information sufficient to form a belief as to the truth or
5 falsity of the allegations of Paragraph 142, and on that basis, denies each and every
6 allegation contained in Paragraph 142.

7 143. In response to Paragraph 143 of the Complaint, Intelius states that it is
8 without knowledge or information sufficient to form a belief as to the truth or
9 falsity of the allegations of Paragraph 143, and on that basis, denies each and every
10 allegation contained in Paragraph 143.

11 **ANSWER TO ALLEGATIONS RE: FACTUAL ALLEGATIONS**
12 **PERTAINING TO DEFENDANTS REED ELSEVIER, INC.; LEXISNEXIS**
13 **GROUP, INC.; LEXISNEXIS RISK SOLUTIONS, INC.; LEXIS RISK &**
14 **INFORMATION ANALYTICS GROUP, INC.; SEISINT, INC d/b/a/**
ACCURINT; CHOICEPOINT, INC. (HEREINAFTER AT TIMES "REED
DEFENDANTS"); AND INTELIOUS

15 144. In response to Paragraph 144 of the Complaint, Intelius incorporates
16 by reference its responses to the allegations of Paragraphs 1 through 143, inclusive,
17 as though fully set forth herein.

18 145. In response to Paragraph 145 of the Complaint, Intelius states that the
19 allegations contained in Paragraph 145 of the Complaint are legal conclusions
20 and/or argument and are not subject to admission or denial. To the extent that
21 Paragraph 145 contains allegations requiring admission or denial, Intelius admits
22 that, through its Consumer Division, it owns and operates interactive websites that
23 allow users to obtain, over the Internet, public information from public sources for
24 reasons other than employment screening, tenant screening, or other purposes
25 covered by the Fair Credit Reporting Act. The information that Intelius provides
26 through its Consumer Division is only public information from public sources.
27 Intelius does not create any of the content contained in any report that Intelius
28 provides users through its Consumer Division. Instead, all of the content contained

1 in reports Intelius furnishes through its Consumer Division come from third parties.
2 Intelius' Enterprise Division is operated through Intelius' subsidiary, TalentWise,
3 which is not a party to this lawsuit. Intelius denies that it has furnished consumer
4 reports about any plaintiff in this action, either under the Fair Credit Reporting Act
5 or any of its state equivalents. Intelius states that it is without knowledge or
6 information sufficient to form a belief as to the truth or falsity of the allegations of
7 Paragraph 145, referring to any other defendant and, on that basis, denies each such
8 allegation. Except as expressly so admitted or denied, Intelius denies each and
9 every allegation contained in Paragraph 145.

10 146. In response to Paragraph 146 of the Complaint, Intelius incorporates
11 its response to Paragraph 145. Intelius states that it is without knowledge or
12 information sufficient to form a belief as to the truth or falsity of the allegations of
13 Paragraph 146, referring to any other defendant and, on that basis, denies each such
14 allegation. Except as expressly so admitted or denied, Intelius denies each and
15 every allegation contained in Paragraph 146.

16 147. In response to Paragraph 147 of the Complaint, Intelius incorporates
17 its response to Paragraph 145. Intelius admits that it is not an information content
18 provider, but instead (as alleged) Intelius obtains its information from others.
19 Intelius states that it is without knowledge or information sufficient to form a belief
20 as to the truth or falsity of the allegations of Paragraph 147, referring to any other
21 defendant and, on that basis, denies each such allegation. Except as expressly so
22 admitted or denied, Intelius denies each and every allegation contained in
23 Paragraph 147.

24 148. In response to Paragraph 148 of the Complaint, Intelius incorporates
25 its response to Paragraph 145. Intelius states that it is without knowledge or
26 information sufficient to form a belief as to the truth or falsity of the allegations of
27 Paragraph 148, referring to any other defendant and, on that basis, denies each such
28 allegation. Except as expressly so admitted or denied, Intelius denies each and

1 every allegation contained in Paragraph 148.

2 149. In response to Paragraph 149 of the Complaint, Intelius incorporates
3 its response to Paragraph 145. Intelius states that it is without knowledge or
4 information sufficient to form a belief as to the truth or falsity of the allegations of
5 Paragraph 149, referring to any other defendant and, on that basis, denies each such
6 allegation. Except as expressly so admitted or denied, Intelius denies each and
7 every allegation contained in Paragraph 149.

8 150. In response to Paragraph 150 of the Complaint, Intelius incorporates
9 its response to Paragraph 145. Intelius states that it is without knowledge or
10 information sufficient to form a belief as to the truth or falsity of the allegations of
11 Paragraph 150, referring to any other defendant and, on that basis, denies each such
12 allegation. Except as expressly so admitted or denied, Intelius denies each and
13 every allegation contained in Paragraph 150.

14 151. In response to Paragraph 151 of the Complaint, Intelius states that the
15 allegations contained in Paragraph 151 of the Complaint are legal conclusions
16 and/or argument and are not subject to admission or denial. To the extent that
17 Paragraph 151 contains allegations requiring admission or denial, Intelius
18 incorporates its response to Paragraph 145. Intelius states that it is without
19 knowledge or information sufficient to form a belief as to the truth or falsity of the
20 allegations of Paragraph 151, referring to any other defendant and, on that basis,
21 denies each such allegation. Except as expressly so admitted or denied, Intelius
22 denies each and every allegation contained in Paragraph 151.

23 152. In response to Paragraph 152 of the Complaint, Intelius denies each
24 and every allegation that pertains to Intelius. Intelius states that it is without
25 knowledge or information sufficient to form a belief as to the truth or falsity of the
26 allegations of Paragraph 152, referring to any other defendant and, on that basis,
27 denies each such allegation.

28 153. In response to Paragraph 153 of the Complaint, Intelius denies each

1 and every allegation that pertains to Intelius. Intelius states that it is without
2 knowledge or information sufficient to form a belief as to the truth or falsity of the
3 allegations of Paragraph 153, referring to any other defendant and, on that basis,
4 denies each such allegation.

5 154. In response to Paragraph 154 of the Complaint, Intelius denies each
6 and every allegation that pertains to Intelius. Intelius states that it is without
7 knowledge or information sufficient to form a belief as to the truth or falsity of the
8 allegations of Paragraph 154, referring to any other defendant and, on that basis,
9 denies each such allegation.

10 155. In response to Paragraph 155 of the Complaint, Intelius denies each
11 and every allegation that pertains to Intelius. Intelius states that it is without
12 knowledge or information sufficient to form a belief as to the truth or falsity of the
13 allegations of Paragraph 155, referring to any other defendant and, on that basis,
14 denies each such allegation.

15 156. In response to Paragraph 156 of the Complaint, Intelius denies each
16 and every allegation that pertains to Intelius. Intelius states that it is without
17 knowledge or information sufficient to form a belief as to the truth or falsity of the
18 allegations of Paragraph 156, referring to any other defendant and, on that basis,
19 denies each such allegation.

20 157. In response to Paragraph 157 of the Complaint, Intelius denies each
21 and every allegation.

22 158. In response to Paragraph 158 of the Complaint, Intelius denies each
23 and every allegation that pertains to Intelius. Intelius states that it is without
24 knowledge or information sufficient to form a belief as to the truth or falsity of the
25 allegations of Paragraph 158, referring to any other defendant and, on that basis,
26 denies each such allegation.

27 159. In response to Paragraph 159 of the Complaint, Intelius states that the
28 allegations contained in Paragraph 159 of the Complaint are legal conclusions

and/or argument and are not subject to admission or denial. To the extent that Paragraph 159 contains allegations requiring admission or denial, Intelius admits that plaintiff Ostella wrote a letter to Intelius requesting, *inter alia*, the names of any person that had done a search on her through Intelius' website. Intelius states that it is without knowledge or information sufficient to form a belief as to the truth or falsity of the allegations of Paragraph 159, referring to any other defendant and, on that basis, denies each such allegation. Except as expressly so admitted or denied, Intelius denies each and every allegation contained in Paragraph 159.

9 160. In response to Paragraph 160 of the Complaint, Intelius denies each
10 and every allegation that pertains to Intelius. Intelius states that it is without
11 knowledge or information sufficient to form a belief as to the truth or falsity of the
12 allegations of Paragraph 160, referring to any other defendant and, on that basis,
13 denies each such allegation.

14 161. In response to Paragraph 161 of the Complaint, Intelius denies each
15 and every allegation that pertains to Intelius. Intelius states that it is without
16 knowledge or information sufficient to form a belief as to the truth or falsity of the
17 allegations of Paragraph 161, referring to any other defendant and, on that basis,
18 denies each such allegation.

19 162. In response to Paragraph 162 of the Complaint, Intelius denies each
20 and every allegation that pertains to Intelius. Intelius states that it is without
21 knowledge or information sufficient to form a belief as to the truth or falsity of the
22 allegations of Paragraph 162, referring to any other defendant and, on that basis,
23 denies each such allegation.

24 163. In response to Paragraph 163 of the Complaint, Intelius denies each
25 and every allegation that pertains to Intelius. Intelius states that it is without
26 knowledge or information sufficient to form a belief as to the truth or falsity of the
27 allegations of Paragraph 163, referring to any other defendant and, on that basis,
28 denies each such allegation.

1 164. In response to Paragraph 164 of the Complaint, Intelius denies each
2 and every allegation that pertains to Intelius. Intelius states that it is without
3 knowledge or information sufficient to form a belief as to the truth or falsity of the
4 allegations of Paragraph 164, referring to any other defendant and, on that basis,
5 denies each such allegation.

6 165. In response to Paragraph 165 of the Complaint, Intelius states that it is
7 without knowledge or information sufficient to form a belief as to the truth or
8 falsity of the allegations of Paragraph 165, and on that basis, denies each and every
9 allegation contained in Paragraph 165.

10 166. In response to Paragraph 166 of the Complaint, Intelius states that the
11 allegations contained in Paragraph 166 of the Complaint are legal conclusions
12 and/or argument and are not subject to admission or denial. To the extent that
13 Paragraph 166 contains allegations requiring admission or denial, Intelius admits
14 that on April 14, 2020, Philip Berg sent a letter to Naveen Jain, the CEO of Intelius.
15 The content of that letter speaks for itself. Intelius denies all other allegations
16 pertaining to Intelius. Intelius states that it is without knowledge or information
17 sufficient to form a belief as to the truth or falsity of the allegations of Paragraph
18 166, referring to any other defendant and, on that basis, denies each such allegation.
19 Except as expressly so admitted or denied, Intelius denies each and every allegation
20 contained in Paragraph 166.

21 167. In response to Paragraph 167 of the Complaint, Intelius states that it is
22 without knowledge or information sufficient to form a belief as to the truth or
23 falsity of the allegations of Paragraph 167, and on that basis, denies each and every
24 allegation contained in Paragraph 167.

25 168. In response to Paragraph 168 of the Complaint, Intelius states that it is
26 without knowledge or information sufficient to form a belief as to the truth or
27 falsity of the allegations of Paragraph 168, and on that basis, denies each and every
28 allegation contained in Paragraph 168.

1 169. In response to Paragraph 169 of the Complaint, Intelius states that it is
2 without knowledge or information sufficient to form a belief as to the truth or
3 falsity of the allegations of Paragraph 169, and on that basis, denies each and every
4 allegation contained in Paragraph 169.

5 170. In response to Paragraph 170 of the Complaint, Intelius states that it is
6 without knowledge or information sufficient to form a belief as to the truth or
7 falsity of the allegations of Paragraph 170, and on that basis, denies each and every
8 allegation contained in Paragraph 170.

9 171. In response to Paragraph 171 of the Complaint, Intelius denies each
10 and every allegation that pertains to Intelius. Intelius states that it is without
11 knowledge or information sufficient to form a belief as to the truth or falsity of the
12 allegations of Paragraph 171, referring to any other defendant and, on that basis,
13 denies each such allegation.

14 332. In response to Paragraph 332 (sic) of the Complaint, Intelius states that
15 it is without knowledge or information sufficient to form a belief as to the truth or
16 falsity of the allegations of Paragraph 332 (sic), and on that basis, denies each and
17 every allegation contained in Paragraph 332 (sic).

18 172. In response to Paragraph 172 of the Complaint, Intelius states that it is
19 without knowledge or information sufficient to form a belief as to the truth or
20 falsity of the allegations of Paragraph 172, and on that basis, denies each and every
21 allegation contained in Paragraph 172.

22 173. In response to Paragraph 173 of the Complaint, Intelius denies each
23 and every allegation that pertains to Intelius. Intelius states that it is without
24 knowledge or information sufficient to form a belief as to the truth or falsity of the
25 allegations of Paragraph 173, referring to any other defendant and, on that basis,
26 denies each such allegation.

27 174. In response to Paragraph 174 of the Complaint, Intelius denies each
28 and every allegation that pertains to Intelius. Intelius states that it is without

1 knowledge or information sufficient to form a belief as to the truth or falsity of the
2 allegations of Paragraph 174, referring to any other defendant and, on that basis,
3 denies each such allegation.

4 **ANSWER TO ALLEGATIONS RE: FACTUAL ALLEGATIONS**
5 **PERTAINING TO DEFENDANTS ORACLE, DAYLIGHT CIS and**
6 **YOSEF TAITZ**

7 175. In response to Paragraph 175 of the Complaint, Intelius incorporates
8 by reference its responses to the allegations of Paragraphs 1 through 174, inclusive,
9 as though fully set forth herein

10 176. In response to Paragraph 176 of the Complaint, Intelius states that it is
11 without knowledge or information sufficient to form a belief as to the truth or
12 falsity of the allegations of Paragraph 176, and on that basis, denies each and every
13 allegation contained in Paragraph 176.

14 177. In response to Paragraph 177 of the Complaint, Intelius states that it is
15 without knowledge or information sufficient to form a belief as to the truth or
16 falsity of the allegations of Paragraph 177, and on that basis, denies each and every
17 allegation contained in Paragraph 177.

18 178. In response to Paragraph 178 of the Complaint, Intelius states that it is
19 without knowledge or information sufficient to form a belief as to the truth or
20 falsity of the allegations of Paragraph 178, and on that basis, denies each and every
21 allegation contained in Paragraph 178.

22 179. In response to Paragraph 179 of the Complaint, Intelius states that it is
23 without knowledge or information sufficient to form a belief as to the truth or
24 falsity of the allegations of Paragraph 179, and on that basis, denies each and every
25 allegation contained in Paragraph 179.

26 180. In response to Paragraph 180 of the Complaint, Intelius states that it is
27 without knowledge or information sufficient to form a belief as to the truth or
28 falsity of the allegations of Paragraph 180, and on that basis, denies each and every

1 allegation contained in Paragraph 180.

2 181. In response to Paragraph 181 of the Complaint, Intelius denies each
3 and every allegation pertaining to Intelius. Intelius states that it is without
4 knowledge or information sufficient to form a belief as to the truth or falsity of the
5 allegations of Paragraph 181 referring to any other defendant and, on that basis,
6 denies each and every allegation contained in Paragraph 181.

7 182. In response to Paragraph 182 of the Complaint, Intelius states that it is
8 without knowledge or information sufficient to form a belief as to the truth or
9 falsity of the allegations of Paragraph 182, and on that basis, denies each and every
10 allegation contained in Paragraph 182.

11 183. In response to Paragraph 183 of the Complaint, Intelius states that it is
12 without knowledge or information sufficient to form a belief as to the truth or
13 falsity of the allegations of Paragraph 183, and on that basis, denies each and every
14 allegation contained in Paragraph 183.

15 184. In response to Paragraph 184 of the Complaint, Intelius states that it is
16 without knowledge or information sufficient to form a belief as to the truth or
17 falsity of the allegations of Paragraph 184, and on that basis, denies each and every
18 allegation contained in Paragraph 184.

19 185. In response to Paragraph 185 of the Complaint, Intelius states that it is
20 without knowledge or information sufficient to form a belief as to the truth or
21 falsity of the allegations of Paragraph 185, and on that basis, denies each and every
22 allegation contained in Paragraph 185.

23 186. In response to Paragraph 186 of the Complaint, Intelius denies each
24 and every allegation pertaining to Intelius. Intelius states that it is without
25 knowledge or information sufficient to form a belief as to the truth or falsity of the
26 allegations of Paragraph 186, pertaining to any other defendant and, on that basis,
27 denies each and every remaining allegation contained in Paragraph 186.

28 ///

ANSWER TO ALLEGATIONS RE: FIRST CAUSE OF ACTION

187. In response to Paragraph 187, Intelius states that the First Cause of Action against Intelius has been dismissed with prejudice and no answer is necessary.

188. In response to Paragraph 188 Intelius states that the First Cause of Action against Intelius has been dismissed with prejudice and no answer is necessary.

189. In response to Paragraph 189 Intelius states that the First Cause of Action against Intelius has been dismissed with prejudice and no answer is necessary.

190. In response to Paragraph 190, Intelius states that the First Cause of Action against Intelius has been dismissed with prejudice and no answer is necessary.

191. In response to Paragraph 191, Intelius states that the First Cause of Action against Intelius has been dismissed with prejudice and no answer is necessary.

192. In response to Paragraph 192, Intelius states that the First Cause of Action against Intelius has been dismissed with prejudice and no answer is necessary.

193. In response to Paragraph 193, Intelius states that the First Cause of Action against Intelius has been dismissed with prejudice and no answer is necessary.

194. In response to Paragraph 194, Intelius states that the First Cause of Action against Intelius has been dismissed with prejudice and no answer is necessary.

195. In response to Paragraph 195, Intelius states that the First Cause of Action against Intelius has been dismissed with prejudice and no answer is necessary.

1 196. In response to Paragraph 196, Intelius states that the First Cause of
2 Action against Intelius has been dismissed with prejudice and no answer is
3 necessary.

4 197. In response to Paragraph 197, Intelius states that the First Cause of
5 Action against Intelius has been dismissed with prejudice and no answer is
6 necessary.

7 198. In response to Paragraph 198, Intelius states that the First Cause of
8 Action against Intelius has been dismissed with prejudice and no answer is
9 necessary.

10 199. In response to Paragraph 199, Intelius states that the First Cause of
11 Action against Intelius has been dismissed with prejudice and no answer is
12 necessary.

13 200. In response to Paragraph 200, Intelius states that the First Cause of
14 Action against Intelius has been dismissed with prejudice and no answer is
15 necessary.

16 201. In response to Paragraph 201, Intelius states that the First Cause of
17 Action against Intelius has been dismissed with prejudice and no answer is
18 necessary.

19 202. In response to Paragraph 202, Intelius states that the First Cause of
20 Action against Intelius has been dismissed with prejudice and no answer is
21 necessary.

22 203. In response to Paragraph 203, Intelius states that the First Cause of
23 Action against Intelius has been dismissed with prejudice and no answer is
24 necessary.

25 204. In response to Paragraph 204, Intelius states that the First Cause of
26 Action against Intelius has been dismissed with prejudice and no answer is
27 necessary.

28 ///

ANSWER TO ALLEGATIONS RE: SECOND CAUSE OF ACTION

205. In response to Paragraph 205, Intelius states that the Second Cause of Action against Intelius has been dismissed with prejudice and no answer is necessary.

206. In response to Paragraph 206, Intelius states that the Second Cause of Action against Intelius has been dismissed with prejudice and no answer is necessary.

207. In response to Paragraph 207, Intelius states that the Second Cause of Action against Intelius has been dismissed with prejudice and no answer is necessary.

208. In response to Paragraph 208, Intelius states that the Second Cause of Action against Intelius has been dismissed with prejudice and no answer is necessary.

209. In response to Paragraph 209, Intelius states that the Second Cause of Action against Intelius has been dismissed with prejudice and no answer is necessary.

210. In response to Paragraph 210, Intelius states that the Second Cause of Action against Intelius has been dismissed with prejudice and no answer is necessary.

211. In response to Paragraph 211, Intelius states that the Second Cause of Action against Intelius has been dismissed with prejudice and no answer is necessary.

212. In response to Paragraph 212, Intelius states that the Second Cause of Action against Intelius has been dismissed with prejudice and no answer is necessary.

213. In response to Paragraph 213, Intelius states that the Second Cause of Action against Intelius has been dismissed with prejudice and no answer is necessary.

1 214. In response to Paragraph 214, Intelius states that the Second Cause of
2 Action against Intelius has been dismissed with prejudice and no answer is
3 necessary.

4 **ANSWER TO ALLEGATIONS RE: THIRD CAUSE OF ACTION**

5 215. In response to Paragraph 215, Intelius states that the Third Cause of
6 Action against Intelius has been dismissed with prejudice and no answer is
7 necessary.

8 216. In response to Paragraph 216, Intelius states that the Third Cause of
9 Action against Intelius has been dismissed with prejudice and no answer is
10 necessary.

11 217. In response to Paragraph 217, Intelius states that the Third Cause of
12 Action against Intelius has been dismissed with prejudice and no answer is
13 necessary.

14 218. In response to Paragraph 218, Intelius states that the Third Cause of
15 Action against Intelius has been dismissed with prejudice and no answer is
16 necessary.

17 219. In response to Paragraph 219, Intelius states that the Third Cause of
18 Action against Intelius has been dismissed with prejudice and no answer is
19 necessary.

20 220. In response to Paragraph 220, Intelius states that the Third Cause of
21 Action against Intelius has been dismissed with prejudice and no answer is
22 necessary.

23 221. In response to Paragraph 221, Intelius states that the Third Cause of
24 Action against Intelius has been dismissed with prejudice and no answer is
25 necessary.

26 222. In response to Paragraph 222, Intelius states that the Third Cause of
27 Action against Intelius has been dismissed with prejudice and no answer is
28 necessary.

1 223. In response to Paragraph 223, Intelius states that the Third Cause of
2 Action against Intelius has been dismissed with prejudice and no answer is
3 necessary.

4 224. In response to Paragraph 224, Intelius states that the Third Cause of
5 Action against Intelius has been dismissed with prejudice and no answer is
6 necessary.

7 225. In response to Paragraph 225, Intelius states that the Third Cause of
8 Action against Intelius has been dismissed with prejudice and no answer is
9 necessary.

10 **ANSWER TO ALLEGATIONS RE: FOURTH CAUSE OF ACTION**

11 226. In response to Paragraph 226, Intelius states that the Fourth Cause of
12 Action does not name Intelius as a defendant and no answer is necessary.

13 227. In response to Paragraph 227, Intelius states that the Fourth Cause of
14 Action does not name Intelius as a defendant and no answer is necessary.

15 228. In response to Paragraph 228, Intelius states that the Fourth Cause of
16 Action does not name Intelius as a defendant and no answer is necessary.

17 229. In response to Paragraph 229, Intelius states that the Fourth Cause of
18 Action does not name Intelius as a defendant and no answer is necessary.

19 230. In response to Paragraph 230, Intelius states that the Fourth Cause of
20 Action does not name Intelius as a defendant and no answer is necessary.

21 231. In response to Paragraph 231, Intelius states that the Fourth Cause of
22 Action does not name Intelius as a defendant and no answer is necessary.

23 232. In response to Paragraph 232, Intelius states that the Fourth Cause of
24 Action does not name Intelius as a defendant and no answer is necessary.

25 233. In response to Paragraph 233, Intelius states that the Fourth Cause of
26 Action does not name Intelius as a defendant and no answer is necessary.

27 234. In response to Paragraph 234, Intelius states that the Fourth Cause of
28 Action does not name Intelius as a defendant and no answer is necessary.

1 235. In response to Paragraph 235, Intelius states that the Fourth Cause of
2 Action does not name Intelius as a defendant and no answer is necessary.

3 236. In response to Paragraph 236, Intelius states that the Fourth Cause of
4 Action does not name Intelius as a defendant and no answer is necessary.

5 237. In response to Paragraph 237, Intelius states that the Fourth Cause of
6 Action does not name Intelius as a defendant and no answer is necessary.

7 238. In response to Paragraph 238, Intelius states that the Fourth Cause of
8 Action does not name Intelius as a defendant and no answer is necessary.

9 **ANSWER TO ALLEGATIONS RE: FIFTH CAUSE OF ACTION**

10 239. In response to Paragraph 239, Intelius states that the Fifth Cause of
11 Action against Intelius has been dismissed with prejudice and no answer is
12 necessary.

13 240. In response to Paragraph 240, Intelius states that the Fifth Cause of
14 Action against Intelius has been dismissed with prejudice and no answer is
15 necessary.

16 241. In response to Paragraph 241, Intelius states that the Fifth Cause of
17 Action against Intelius has been dismissed with prejudice and no answer is
18 necessary.

19 242. In response to Paragraph 242, Intelius states that the Fifth Cause of
20 Action against Intelius has been dismissed with prejudice and no answer is
21 necessary.

22 243. In response to Paragraph 243, Intelius states that the Fifth Cause of
23 Action against Intelius has been dismissed with prejudice and no answer is
24 necessary.

25 244. In response to Paragraph 244, Intelius states that the Fifth Cause of
26 Action against Intelius has been dismissed with prejudice and no answer is
27 necessary.

28 245. In response to Paragraph 245, Intelius states that the Fifth Cause of

1 Action against Intelius has been dismissed with prejudice and no answer is
2 necessary.

3 246. In response to Paragraph 246, Intelius states that the Fifth Cause of
4 Action against Intelius has been dismissed with prejudice and no answer is
5 necessary.

6 247. In response to Paragraph 247, Intelius states that the Fifth Cause of
7 Action against Intelius has been dismissed with prejudice and no answer is
8 necessary.

9 **ANSWER TO ALLEGATIONS RE: SIXTH CAUSE OF ACTION**

10 248. In response to Paragraph 248, Intelius states that the Sixth Cause of
11 Action against Intelius has been dismissed with prejudice and no answer is
12 necessary.

13 249. In response to Paragraph 249, Intelius states that the Fifth Cause of
14 Action against Intelius has been dismissed with prejudice and no answer is
15 necessary.

16 250. In response to Paragraph 250, Intelius states that the Fifth Cause of
17 Action against Intelius has been dismissed with prejudice and no answer is
18 necessary.

19 251. In response to Paragraph 251, Intelius states that the Fifth Cause of
20 Action against Intelius has been dismissed with prejudice and no answer is
21 necessary.

22 252. In response to Paragraph 252, Intelius states that the Fifth Cause of
23 Action against Intelius has been dismissed with prejudice and no answer is
24 necessary.

25 253. In response to Paragraph 253, Intelius states that the Fifth Cause of
26 Action against Intelius has been dismissed with prejudice and no answer is
27 necessary.

28 254. In response to Paragraph 254, Intelius states that the Fifth Cause of

1 Action against Intelius has been dismissed with prejudice and no answer is
2 necessary.

3 255. In response to Paragraph 255, Intelius states that the Fifth Cause of
4 Action against Intelius has been dismissed with prejudice and no answer is
5 necessary.

6 256. In response to Paragraph 256, Intelius states that the Fifth Cause of
7 Action against Intelius has been dismissed with prejudice and no answer is
8 necessary.

9 257. In response to Paragraph 257, Intelius states that the Fifth Cause of
10 Action against Intelius has been dismissed with prejudice and no answer is
11 necessary.

12 258. In response to Paragraph 258, Intelius states that the Fifth Cause of
13 Action against Intelius has been dismissed with prejudice and no answer is
14 necessary.

15 259. In response to Paragraph 259, Intelius states that the Fifth Cause of
16 Action against Intelius has been dismissed with prejudice and no answer is
17 necessary.

18 260. In response to Paragraph 260, Intelius states that the Fifth Cause of
19 Action against Intelius has been dismissed with prejudice and no answer is
20 necessary.

21 261. In response to Paragraph 261, Intelius states that the Fifth Cause of
22 Action against Intelius has been dismissed with prejudice and no answer is
23 necessary.

24 262. In response to Paragraph 262, Intelius states that the Fifth Cause of
25 Action against Intelius has been dismissed with prejudice and no answer is
26 necessary.

27 263. In response to Paragraph 263, Intelius states that the Fifth Cause of
28 Action against Intelius has been dismissed with prejudice and no answer is

1 necessary.

2 264. In response to Paragraph 264, Intelius states that the Fifth Cause of
3 Action against Intelius has been dismissed with prejudice and no answer is
4 necessary.

5 **ANSWER TO ALLEGATIONS RE: SEVENTH CAUSE OF ACTION**

6 265. In response to Paragraph 265, Intelius states that the Seventh Cause of
7 Action does not name Intelius as a defendant and no answer is necessary.

8 266. In response to Paragraph 266, Intelius states that the Seventh Cause of
9 Action does not name Intelius as a defendant and no answer is necessary.

10 267. In response to Paragraph 267, Intelius states that the Seventh Cause of
11 Action does not name Intelius as a defendant and no answer is necessary.

12 268. In response to Paragraph 268, Intelius states that the Seventh Cause of
13 Action does not name Intelius as a defendant and no answer is necessary.

14 269. In response to Paragraph 269, Intelius states that the Seventh Cause of
15 Action does not name Intelius as a defendant and no answer is necessary.

16 270. In response to Paragraph 270, Intelius states that the Seventh Cause of
17 Action does not name Intelius as a defendant and no answer is necessary.

18 271. In response to Paragraph 271, Intelius states that the Seventh Cause of
19 Action does not name Intelius as a defendant and no answer is necessary.

20 272. In response to Paragraph 272, Intelius states that the Seventh Cause of
21 Action does not name Intelius as a defendant and no answer is necessary.

22 273. In response to Paragraph 273, Intelius states that the Seventh Cause of
23 Action does not name Intelius as a defendant and no answer is necessary.

24 274. In response to Paragraph 274, Intelius states that the Seventh Cause of
25 Action does not name Intelius as a defendant and no answer is necessary.

26 275. In response to Paragraph 275, Intelius states that the Seventh Cause of
27 Action does not name Intelius as a defendant and no answer is necessary.

28 276. In response to Paragraph 276, Intelius states that the Seventh Cause of

1 Action does not name Intelius as a defendant and no answer is necessary.

2 277. In response to Paragraph 277, Intelius states that the Seventh Cause of
3 Action does not name Intelius as a defendant and no answer is necessary.

4 278. In response to Paragraph 278, Intelius states that the Seventh Cause of
5 Action does not name Intelius as a defendant and no answer is necessary.

6 279. In response to Paragraph 279, Intelius states that the Seventh Cause of
7 Action does not name Intelius as a defendant and no answer is necessary.

8 280. In response to Paragraph 280, Intelius states that the Seventh Cause of
9 Action does not name Intelius as a defendant and no answer is necessary.

10 **ANSWER TO ALLEGATIONS RE: EIGHTH CAUSE OF ACTION**

11 281. In response to Paragraph 281, Intelius states that the Eighth Cause of
12 Action against Intelius has been dismissed with prejudice and no answer is
13 necessary.

14 282. In response to Paragraph 282, Intelius states that the Eighth Cause of
15 Action against Intelius has been dismissed with prejudice and no answer is
16 necessary.

17 283. In response to Paragraph 283, Intelius states that the Eighth Cause of
18 Action against Intelius has been dismissed with prejudice and no answer is
19 necessary.

20 284. In response to Paragraph 284, Intelius states that the Eighth Cause of
21 Action against Intelius has been dismissed with prejudice and no answer is
22 necessary.

23 285. In response to Paragraph 285, Intelius states that the Eighth Cause of
24 Action against Intelius has been dismissed with prejudice and no answer is
25 necessary.

26 286. In response to Paragraph 286, Intelius states that the Eighth Cause of
27 Action against Intelius has been dismissed with prejudice and no answer is
28 necessary.

1 287. In response to Paragraph 287, Intelius states that the Eighth Cause of
2 Action against Intelius has been dismissed with prejudice and no answer is
3 necessary.

4 288. In response to Paragraph 288, Intelius states that the Eighth Cause of
5 Action against Intelius has been dismissed with prejudice and no answer is
6 necessary.

7 289. In response to Paragraph 289, Intelius states that the Eighth Cause of
8 Action against Intelius has been dismissed with prejudice and no answer is
9 necessary.

10 290. In response to Paragraph 290, Intelius states that the Eighth Cause of
11 Action against Intelius has been dismissed with prejudice and no answer is
12 necessary.

13 291. In response to Paragraph 291, Intelius states that the Eighth Cause of
14 Action against Intelius has been dismissed with prejudice and no answer is
15 necessary.

16 292. In response to Paragraph 292, Intelius states that the Eighth Cause of
17 Action against Intelius has been dismissed with prejudice and no answer is
18 necessary.

19 293. In response to Paragraph 293, Intelius states that the Eighth Cause of
20 Action against Intelius has been dismissed with prejudice and no answer is
21 necessary.

22 294. In response to Paragraph 294, Intelius states that the Eighth Cause of
23 Action against Intelius has been dismissed with prejudice and no answer is
24 necessary.

25 295. In response to Paragraph 295, Intelius states that the Eighth Cause of
26 Action against Intelius has been dismissed with prejudice and no answer is
27 necessary.

28 296. In response to Paragraph 296, Intelius states that the Eighth Cause of

1 Action against Intelius has been dismissed with prejudice and no answer is
2 necessary.

3 297. In response to Paragraph 297, Intelius states that the Eighth Cause of
4 Action against Intelius has been dismissed with prejudice and no answer is
5 necessary.

6 298. In response to Paragraph 298, Intelius states that the Eighth Cause of
7 Action against Intelius has been dismissed with prejudice and no answer is
8 necessary.

9 299. In response to Paragraph 299, Intelius states that the Eighth Cause of
10 Action against Intelius has been dismissed with prejudice and no answer is
11 necessary.

12 300. In response to Paragraph 300, Intelius states that the Eighth Cause of
13 Action against Intelius has been dismissed with prejudice and no answer is
14 necessary.

15 **ANSWER TO ALLEGATIONS RE: NINTH CAUSE OF ACTION**

16 301. In response to Paragraph 301, Intelius states that the Ninth Cause of
17 Action against Intelius has been dismissed with prejudice and no answer is
18 necessary.

19 302. In response to Paragraph 302, Intelius states that the Ninth Cause of
20 Action against Intelius has been dismissed with prejudice and no answer is
21 necessary.

22 303. In response to Paragraph 303, Intelius states that the Ninth Cause of
23 Action against Intelius has been dismissed with prejudice and no answer is
24 necessary.

25 304. In response to Paragraph 304, Intelius states that the Ninth Cause of
26 Action against Intelius has been dismissed with prejudice and no answer is
27 necessary.

28 305. In response to Paragraph 305, Intelius states that the Ninth Cause of

1 Action against Intelius has been dismissed with prejudice and no answer is
2 necessary.

3 306. In response to Paragraph 306, Intelius states that the Ninth Cause of
4 Action against Intelius has been dismissed with prejudice and no answer is
5 necessary.

6 307. In response to Paragraph 307, Intelius states that the Ninth Cause of
7 Action against Intelius has been dismissed with prejudice and no answer is
8 necessary.

9 308. In response to Paragraph 308, Intelius states that the Ninth Cause of
10 Action against Intelius has been dismissed with prejudice and no answer is
11 necessary.

12 309. In response to Paragraph 309, Intelius states that the Ninth Cause of
13 Action against Intelius has been dismissed with prejudice and no answer is
14 necessary.

15 310. In response to Paragraph 310, Intelius states that the Ninth Cause of
16 Action against Intelius has been dismissed with prejudice and no answer is
17 necessary.

18 311. In response to Paragraph 311, Intelius states that the Ninth Cause of
19 Action against Intelius has been dismissed with prejudice and no answer is
20 necessary.

21 312. In response to Paragraph 312, Intelius states that the Ninth Cause of
22 Action against Intelius has been dismissed with prejudice and no answer is
23 necessary.

24 313. In response to Paragraph 313, Intelius states that the Ninth Cause of
25 Action against Intelius has been dismissed with prejudice and no answer is
26 necessary.

27 314. In response to Paragraph 314, Intelius states that the Ninth Cause of
28 Action against Intelius has been dismissed with prejudice and no answer is

1 necessary.

2 **ANSWER TO ALLEGATIONS RE: TENTH CAUSE OF ACTION**

3 315. In response to Paragraph 315, Intelius states that the Tenth Cause of
4 Action does not name Intelius as a defendant and no answer is necessary.

5 316. In response to Paragraph 316, Intelius states that the Tenth Cause of
6 Action does not name Intelius as a defendant and no answer is necessary.

7 317. In response to Paragraph 317, Intelius states that the Tenth Cause of
8 Action does not name Intelius as a defendant and no answer is necessary.

9 318. In response to Paragraph 318, Intelius states that the Tenth Cause of
10 Action does not name Intelius as a defendant and no answer is necessary.

11 319. In response to Paragraph 319, Intelius states that the Tenth Cause of
12 Action does not name Intelius as a defendant and no answer is necessary.

13 320. In response to Paragraph 320, Intelius states that the Tenth Cause of
14 Action does not name Intelius as a defendant and no answer is necessary.

15 321. In response to Paragraph 321, Intelius states that the Tenth Cause of
16 Action does not name Intelius as a defendant and no answer is necessary.

17 322. In response to Paragraph 322, Intelius states that the Tenth Cause of
18 Action does not name Intelius as a defendant and no answer is necessary.

19 323. In response to Paragraph 323, Intelius states that the Tenth Cause of
20 Action does not name Intelius as a defendant and no answer is necessary.

21 324. In response to Paragraph 324, Intelius states that the Tenth Cause of
22 Action does not name Intelius as a defendant and no answer is necessary.

23 325. In response to Paragraph 325, Intelius states that the Tenth Cause of
24 Action does not name Intelius as a defendant and no answer is necessary.

25 **ANSWER TO ALLEGATIONS RE: ELEVENTH CAUSE OF ACTION**

26 326. In response to Paragraph 326, Intelius states that the Eleventh Cause of
27 Action does not name Intelius as a defendant and no answer is necessary.

28 327. In response to Paragraph 327, Intelius states that the Eleventh Cause of

1 Action does not name Intelius as a defendant and no answer is necessary.

2 328. In response to Paragraph 328, Intelius states that the Eleventh Cause of
3 Action does not name Intelius as a defendant and no answer is necessary.

4 329. In response to Paragraph 329, Intelius states that the Eleventh Cause of
5 Action does not name Intelius as a defendant and no answer is necessary.

6 330. In response to Paragraph 330, Intelius states that the Eleventh Cause of
7 Action does not name Intelius as a defendant and no answer is necessary.

8 331. In response to Paragraph 331, Intelius states that the Eleventh Cause of
9 Action does not name Intelius as a defendant and no answer is necessary.

10 332. In response to Paragraph 332, Intelius states that the Eleventh Cause of
11 Action does not name Intelius as a defendant and no answer is necessary.

12 333. In response to Paragraph 333, Intelius states that the Eleventh Cause of
13 Action does not name Intelius as a defendant and no answer is necessary.

14 334. In response to Paragraph 334, Intelius states that the Eleventh Cause of
15 Action does not name Intelius as a defendant and no answer is necessary.

16 **ANSWER TO ALLEGATIONS RE: TWELFTH CAUSE OF ACTION**

17 335. In response to Paragraph 335 of the Complaint, Intelius incorporates
18 by reference its responses to the allegations of Paragraphs 1 through 334, inclusive,
19 as though fully set forth herein.

20 336. In response to Paragraph 336 of the Complaint, Intelius incorporates
21 its response to Paragraph 145. Intelius states that it is without knowledge or
22 information sufficient to form a belief as to the truth or falsity of the allegations of
23 Paragraph 336, referring to any other defendant and, on that basis, denies each such
24 allegation. Except as expressly so admitted or denied, Intelius denies each and
25 every allegation contained in Paragraph 336.

26 337. In response to Paragraph 337, Intelius states that the allegations
27 contained in Paragraph 337 of the Complaint are legal conclusions and/or argument
28 and are not subject to admission or denial. Except as expressly so admitted or

1 denied, Intelius denies each and every allegation contained in Paragraph 337.

2 338. In response to Paragraph 338, Intelius incorporates its response to
3 Paragraph 145. Intelius states that it is without knowledge or information sufficient
4 to form a belief as to the truth or falsity of the allegations of Paragraph 338,
5 referring to any other defendant and, on that basis, denies each such allegation.
6 Except as expressly so admitted or denied, Intelius denies each and every allegation
7 contained in Paragraph 338.

8 339. In response to Paragraph 339 of the Complaint, Intelius states that it is
9 without knowledge or information sufficient to form a belief as to the truth or
10 falsity of the allegations of Paragraph 339, and on that basis, denies each and every
11 allegation contained in Paragraph 339.

12 340. In response to Paragraph 340, Intelius incorporates its response to
13 Paragraph 166. Except as expressly so admitted or denied, Intelius denies each and
14 every allegation contained in Paragraph 340.

15 341. In response to Paragraph 341 of the Complaint, Intelius states that it is
16 without knowledge or information sufficient to form a belief as to the truth or
17 falsity of the allegations of Paragraph 341, and on that basis, denies each and every
18 allegation contained in Paragraph 341.

19 342. In response to Paragraph 342, Intelius denies each and every allegation
20 pertaining to Intelius. Intelius states that it is without knowledge or information
21 sufficient to form a belief as to the truth or falsity of the allegations of Paragraph
22 342, referring to any other defendant and, on that basis, denies each such allegation.

23 343. In response to Paragraph 343, Intelius denies each and every allegation
24 pertaining to Intelius. Intelius states that it is without knowledge or information
25 sufficient to form a belief as to the truth or falsity of the allegations of Paragraph
26 343, referring to any other defendant and, on that basis, denies each such allegation.

27 344. In response to Paragraph 344, Intelius states that the allegations
28 contained in Paragraph 344 of the Complaint are legal conclusions and/or argument

1 and are not subject to admission or denial.

2 345. In response to Paragraph 345, Intelius denies each and every allegation
3 pertaining to Intelius. Intelius states that it is without knowledge or information
4 sufficient to form a belief as to the truth or falsity of the allegations of Paragraph
5 345, referring to any other defendant and, on that basis, denies each such allegation.

6 346. In response to Paragraph 346, Intelius denies each and every allegation
7 pertaining to Intelius. Intelius states that it is without knowledge or information
8 sufficient to form a belief as to the truth or falsity of the allegations of Paragraph
9 346, referring to any other defendant and, on that basis, denies each such allegation.

10 **ANSWER TO ALLEGATIONS RE: THIRTEENTH CAUSE OF ACTION**

11 341. In response to Paragraph 341 (sic) of the Complaint, Intelius
12 incorporates by reference its responses to the allegations of Paragraphs 1 through
13 346, inclusive, as though fully set forth herein.

14 342. In response to Paragraph 342 (sic) of the Complaint, Intelius states that
15 it is without knowledge or information sufficient to form a belief as to the truth or
16 falsity of the allegations of Paragraph 342 (sic), and on that basis, denies each and
17 every allegation contained in Paragraph 342 (sic).

18 343. In response to Paragraph 343 (sic), Intelius denies each and every
19 allegation pertaining to Intelius. Intelius states that it is without knowledge or
20 information sufficient to form a belief as to the truth or falsity of the allegations of
21 Paragraph 343 (sic), referring to any other defendant and, on that basis, denies each
22 such allegation.

23 344. In response to Paragraph 344 (sic) of the Complaint, Intelius states that
24 it is without knowledge or information sufficient to form a belief as to the truth or
25 falsity of the allegations of Paragraph 344 (sic), and on that basis, denies each and
26 every allegation contained in Paragraph 344 (sic).

27 345. In response to Paragraph 345 (sic), Intelius denies each and every
28 allegation pertaining to Intelius. Intelius states that it is without knowledge or

1 information sufficient to form a belief as to the truth or falsity of the allegations of
2 Paragraph 345 (sic), referring to any other defendant and, on that basis, denies each
3 such allegation.

4 346. In response to Paragraph 346 (sic), Intelius denies each and every
5 allegation pertaining to Intelius. Intelius states that it is without knowledge or
6 information sufficient to form a belief as to the truth or falsity of the allegations of
7 Paragraph 346 (sic), referring to any other defendant and, on that basis, denies each
8 such allegation.

9 347. In response to Paragraph 347, Intelius denies each and every allegation
10 pertaining to Intelius. Intelius states that it is without knowledge or information
11 sufficient to form a belief as to the truth or falsity of the allegations of Paragraph
12 347, referring to any other defendant and, on that basis, denies each such allegation.

13 348. In response to Paragraph 348, Intelius denies each and every allegation
14 pertaining to Intelius. Intelius states that it is without knowledge or information
15 sufficient to form a belief as to the truth or falsity of the allegations of Paragraph
16 348, referring to any other defendant and, on that basis, denies each such allegation.

17 349. In response to Paragraph 349, Intelius denies each and every allegation
18 pertaining to Intelius. Intelius states that it is without knowledge or information
19 sufficient to form a belief as to the truth or falsity of the allegations of Paragraph
20 349, referring to any other defendant and, on that basis, denies each such allegation.

21 350. In response to Paragraph 350, Intelius states that the allegations
22 contained in Paragraph 350 of the Complaint are legal conclusions and/or argument
23 and are not subject to admission or denial.

24 351. In response to Paragraph 351, Intelius denies each and every allegation
25 pertaining to Intelius. Intelius states that it is without knowledge or information
26 sufficient to form a belief as to the truth or falsity of the allegations of Paragraph
27 351, referring to any other defendant and, on that basis, denies each such allegation.

28 352. In response to Paragraph 352, Intelius denies each and every allegation

1 pertaining to Intelius. Intelius states that it is without knowledge or information
2 sufficient to form a belief as to the truth or falsity of the allegations of Paragraph
3 352, referring to any other defendant and, on that basis, denies each such allegation.

4 **ANSWER TO ALLEGATIONS RE: FOURTEENTH CAUSE OF ACTION**

5 353. In response to Paragraph 353 of the Complaint, Intelius incorporates
6 by reference its responses to the allegations of Paragraphs 1 through 352, inclusive,
7 as though fully set forth herein.

8 354. In response to Paragraph 354, Intelius denies each and every allegation
9 pertaining to Intelius. Intelius states that it is without knowledge or information
10 sufficient to form a belief as to the truth or falsity of the allegations of Paragraph
11 354, referring to any other defendant and, on that basis, denies each such allegation.

12 355. In response to Paragraph 355, Intelius denies each and every allegation
13 pertaining to Intelius. Intelius states that it is without knowledge or information
14 sufficient to form a belief as to the truth or falsity of the allegations of Paragraph
15 355, referring to any other defendant and, on that basis, denies each such allegation.

16 356. In response to Paragraph 356, Intelius denies each and every allegation
17 pertaining to Intelius. Intelius states that it is without knowledge or information
18 sufficient to form a belief as to the truth or falsity of the allegations of Paragraph
19 356, referring to any other defendant and, on that basis, denies each such allegation.

20 357. In response to Paragraph 357, Intelius denies each and every allegation
21 pertaining to Intelius. Intelius states that it is without knowledge or information
22 sufficient to form a belief as to the truth or falsity of the allegations of Paragraph
23 357, referring to any other defendant and, on that basis, denies each such allegation.

24 358. In response to Paragraph 358 of the Complaint, Intelius states that it is
25 without knowledge or information sufficient to form a belief as to the truth or
26 falsity of the allegations of Paragraph 358, and on that basis, denies each and every
27 allegation contained in Paragraph 358.

28 359. In response to Paragraph 359 of the Complaint, Intelius states that it is

1 without knowledge or information sufficient to form a belief as to the truth or
2 falsity of the allegations of Paragraph 359, and on that basis, denies each and every
3 allegation contained in Paragraph 359.

4 360. In response to Paragraph 360 of the Complaint, Intelius states that it is
5 without knowledge or information sufficient to form a belief as to the truth or
6 falsity of the allegations of Paragraph 360, and on that basis, denies each and every
7 allegation contained in Paragraph 360.

8 361. In response to Paragraph 361 of the Complaint, Intelius states that it is
9 without knowledge or information sufficient to form a belief as to the truth or
10 falsity of the allegations of Paragraph 361, and on that basis, denies each and every
11 allegation contained in Paragraph 361.

12 362. In response to Paragraph 362 of the Complaint, Intelius states that the
13 allegations contained in Paragraph 362 of the Complaint are legal conclusions
14 and/or argument and are not subject to admission or denial.

15 363. In response to Paragraph 363 of the Complaint, Intelius denies each
16 and every allegation pertaining to Intelius. Intelius states that it is without
17 knowledge or information sufficient to form a belief as to the truth or falsity of the
18 allegations of Paragraph 363, referring to any other defendant and, on that basis,
19 denies each such allegation.

20 364. In response to Paragraph 364 of the Complaint, Intelius denies each
21 and every allegation pertaining to Intelius. Intelius states that it is without
22 knowledge or information sufficient to form a belief as to the truth or falsity of the
23 allegations of Paragraph 364, referring to any other defendant and, on that basis,
24 denies each such allegation.

25 **ANSWER TO ALLEGATIONS RE: FIFTEENTH CAUSE OF ACTION**

26 365. In response to Paragraph 365 of the Complaint, Intelius incorporates
27 by reference its responses to the allegations of Paragraphs 1 through 364, inclusive,
28 as though fully set forth herein

1 366. In response to Paragraph 366, Intelius denies each and every allegation
2 pertaining to Intelius. Intelius states that it is without knowledge or information
3 sufficient to form a belief as to the truth or falsity of the allegations of Paragraph
4 366, referring to any other defendant and, on that basis, denies each such allegation.

5 367. In response to Paragraph 367, Intelius denies each and every allegation
6 pertaining to Intelius. Intelius states that it is without knowledge or information
7 sufficient to form a belief as to the truth or falsity of the allegations of Paragraph
8 367, referring to any other defendant and, on that basis, denies each such allegation.

9 368. In response to Paragraph 368, Intelius denies each and every allegation
10 pertaining to Intelius. Intelius states that it is without knowledge or information
11 sufficient to form a belief as to the truth or falsity of the allegations of Paragraph
12 368, referring to any other defendant and, on that basis, denies each such allegation.

13 369. In response to Paragraph 369, Intelius denies each and every allegation
14 pertaining to Intelius. Intelius states that it is without knowledge or information
15 sufficient to form a belief as to the truth or falsity of the allegations of Paragraph
16 369, referring to any other defendant and, on that basis, denies each such allegation.

17 370. In response to Paragraph 370, Intelius states that it is without
18 knowledge or information sufficient to form a belief as to the truth or falsity of the
19 allegations of Paragraph 370, and on that basis, denies each such allegation.

20 371. In response to Paragraph 371 of the Complaint, Intelius states that the
21 allegations contained in Paragraph 371 of the Complaint are legal conclusions
22 and/or argument and are not subject to admission or denial.

23 372. In response to Paragraph 372 of the Complaint, Intelius denies each
24 and every allegation pertaining to Intelius. Intelius states that it is without
25 knowledge or information sufficient to form a belief as to the truth or falsity of the
26 allegations of Paragraph 372, referring to any other defendant and, on that basis,
27 denies each such allegation.

28 373. In response to Paragraph 373 of the Complaint, Intelius denies each

1 and every allegation pertaining to Intelius. Intelius states that it is without
2 knowledge or information sufficient to form a belief as to the truth or falsity of the
3 allegations of Paragraph 373, referring to any other defendant and, on that basis,
4 denies each such allegation.

5 **ANSWER TO ALLEGATIONS RE: SIXTEENTH CAUSE OF ACTION**

6 374. In response to Paragraph 374 of the Complaint, Intelius incorporates
7 by reference its responses to the allegations of Paragraphs 1 through 373, inclusive,
8 as though fully set forth herein.

9 375. In response to Paragraph 375, Intelius denies each and every allegation
10 pertaining to Intelius. Intelius states that it is without knowledge or information
11 sufficient to form a belief as to the truth or falsity of the allegations of Paragraph
12 375, referring to any other defendant and, on that basis, denies each such allegation.

13 376. In response to Paragraph 376, Intelius denies each and every allegation
14 pertaining to Intelius. Intelius states that it is without knowledge or information
15 sufficient to form a belief as to the truth or falsity of the allegations of Paragraph
16 376, referring to any other defendant and, on that basis, denies each such allegation.

17 377. In response to Paragraph 377, Intelius denies each and every allegation
18 pertaining to Intelius. Intelius states that it is without knowledge or information
19 sufficient to form a belief as to the truth or falsity of the allegations of Paragraph
20 377, referring to any other defendant and, on that basis, denies each such allegation.

21 378. In response to Paragraph 378 of the Complaint, Intelius states that the
22 allegations contained in Paragraph 378 of the Complaint are legal conclusions
23 and/or argument and are not subject to admission or denial.

24 379. In response to Paragraph 379 of the Complaint, Intelius denies each
25 and every allegation pertaining to Intelius. Intelius states that it is without
26 knowledge or information sufficient to form a belief as to the truth or falsity of the
27 allegations of Paragraph 379, referring to any other defendant and, on that basis,
28 denies each such allegation.

1 380. In response to Paragraph 380 of the Complaint, Intelius denies each
2 and every allegation pertaining to Intelius. Intelius states that it is without
3 knowledge or information sufficient to form a belief as to the truth or falsity of the
4 allegations of Paragraph 380, referring to any other defendant and, on that basis,
5 denies each such allegation.

6 **ANSWER TO ALLEGATIONS RE: SEVENTEENTH CAUSE OF ACTION**

7 381. In response to Paragraph 381, Intelius states that the Seventeenth
8 Cause of Action against Intelius has been dismissed with prejudice and no answer is
9 necessary.

10 382. In response to Paragraph 382, Intelius states that the Seventeenth
11 Cause of Action against Intelius has been dismissed with prejudice and no answer is
12 necessary.

13 383. In response to Paragraph 383, Intelius states that the Seventeenth
14 Cause of Action against Intelius has been dismissed with prejudice and no answer is
15 necessary.

16 384. In response to Paragraph 384, Intelius states that the Seventeenth
17 Cause of Action against Intelius has been dismissed with prejudice and no answer is
18 necessary.

19 385. In response to Paragraph 385, Intelius states that the Seventeenth
20 Cause of Action against Intelius has been dismissed with prejudice and no answer is
21 necessary.

22 386. In response to Paragraph 386, Intelius states that the Seventeenth
23 Cause of Action against Intelius has been dismissed with prejudice and no answer is
24 necessary.

25 387. In response to Paragraph 387, Intelius states that the Seventeenth
26 Cause of Action against Intelius has been dismissed with prejudice and no answer is
27 necessary.

28 388. In response to Paragraph 388, Intelius states that the Seventeenth

1 Cause of Action against Intelius has been dismissed with prejudice and no answer is
2 necessary.

3 389. In response to Paragraph 389, Intelius states that the Seventeenth
4 Cause of Action against Intelius has been dismissed with prejudice and no answer is
5 necessary.

6 390. In response to Paragraph 390, Intelius states that the Seventeenth
7 Cause of Action against Intelius has been dismissed with prejudice and no answer is
8 necessary.

9 391. In response to Paragraph 391, Intelius states that the Seventeenth
10 Cause of Action against Intelius has been dismissed with prejudice and no answer is
11 necessary.

12 382. In response to Paragraph 382, Intelius states that the Seventeenth
13 Cause of Action against Intelius has been dismissed with prejudice and no answer is
14 necessary.

15 383. In response to Paragraph 383, Intelius states that the Seventeenth
16 Cause of Action against Intelius has been dismissed with prejudice and no answer is
17 necessary.

18 384. In response to Paragraph 384, Intelius states that the Seventeenth
19 Cause of Action against Intelius has been dismissed with prejudice and no answer is
20 necessary.

21 385. In response to Paragraph 385, Intelius states that the Seventeenth
22 Cause of Action against Intelius has been dismissed with prejudice and no answer is
23 necessary.

24 386. In response to Paragraph 386, Intelius states that the Seventeenth
25 Cause of Action against Intelius has been dismissed with prejudice and no answer is
26 necessary.

27 387. In response to Paragraph 387, Intelius states that the Seventeenth
28 Cause of Action against Intelius has been dismissed with prejudice and no answer is

1 necessary.

2 388. In response to Paragraph 388, Intelius states that the Seventeenth
3 Cause of Action against Intelius has been dismissed with prejudice and no answer is
4 necessary.

5 389. In response to Paragraph 389, Intelius states that the Seventeenth
6 Cause of Action against Intelius has been dismissed with prejudice and no answer is
7 necessary.

8 **ANSWER TO ALLEGATIONS RE: EIGHTEENTH CAUSE OF ACTION**

9 390. In response to Paragraph 390, Intelius states that the Eighteenth Cause
10 of Action against Intelius has been dismissed with prejudice and no answer is
11 necessary.

12 391. In response to Paragraph 391, Intelius states that the Eighteenth Cause
13 of Action against Intelius has been dismissed with prejudice and no answer is
14 necessary.

15 392. In response to Paragraph 392, Intelius states that the Eighteenth Cause
16 of Action against Intelius has been dismissed with prejudice and no answer is
17 necessary.

18 393. In response to Paragraph 393, Intelius states that the Eighteenth Cause
19 of Action against Intelius has been dismissed with prejudice and no answer is
20 necessary.

21 394. In response to Paragraph 394, Intelius states that the Eighteenth Cause
22 of Action against Intelius has been dismissed with prejudice and no answer is
23 necessary.

24 395. In response to Paragraph 395, Intelius states that the Eighteenth Cause
25 of Action against Intelius has been dismissed with prejudice and no answer is
26 necessary.

27 396. In response to Paragraph 396, Intelius states that the Eighteenth Cause
28 of Action against Intelius has been dismissed with prejudice and no answer is

1 necessary.

2 397. In response to Paragraph 397, Intelius states that the Eighteenth Cause
3 of Action against Intelius has been dismissed with prejudice and no answer is
4 necessary.

5 **ANSWER TO ALLEGATIONS RE: NINETEENTH CAUSE OF ACTION**

6 398. In response to Paragraph 398, Intelius states that the Nineteenth Cause
7 of Action against Intelius has been dismissed with prejudice and no answer is
8 necessary.

9 399. In response to Paragraph 399, Intelius states that the Nineteenth Cause
10 of Action against Intelius has been dismissed with prejudice and no answer is
11 necessary.

12 400. In response to Paragraph 400, Intelius states that the Nineteenth Cause
13 of Action against Intelius has been dismissed with prejudice and no answer is
14 necessary.

15 401. In response to Paragraph 401, Intelius states that the Nineteenth Cause
16 of Action against Intelius has been dismissed with prejudice and no answer is
17 necessary.

18 402. In response to Paragraph 402, Intelius states that the Nineteenth Cause
19 of Action against Intelius has been dismissed with prejudice and no answer is
20 necessary.

21 403. In response to Paragraph 403, Intelius states that the Nineteenth Cause
22 of Action against Intelius has been dismissed with prejudice and no answer is
23 necessary.

24 404. In response to Paragraph 404, Intelius states that the Nineteenth Cause
25 of Action against Intelius has been dismissed with prejudice and no answer is
26 necessary.

27 405. In response to Paragraph 405, Intelius states that the Nineteenth Cause
28 of Action against Intelius has been dismissed with prejudice and no answer is

1 necessary.

2 406. In response to Paragraph 406, Intelius states that the Nineteenth Cause
3 of Action against Intelius has been dismissed with prejudice and no answer is
4 necessary.

5 407. In response to Paragraph 407, Intelius states that the Nineteenth Cause
6 of Action against Intelius has been dismissed with prejudice and no answer is
7 necessary.

8 408. In response to Paragraph 408, Intelius states that the Nineteenth Cause
9 of Action against Intelius has been dismissed with prejudice and no answer is
10 necessary.

11 409. In response to Paragraph 409, Intelius states that the Nineteenth Cause
12 of Action against Intelius has been dismissed with prejudice and no answer is
13 necessary.

14 410. In response to Paragraph 410, Intelius states that the Nineteenth Cause
15 of Action against Intelius has been dismissed with prejudice and no answer is
16 necessary.

17 411. In response to Paragraph 411, Intelius states that the Nineteenth Cause
18 of Action against Intelius has been dismissed with prejudice and no answer is
19 necessary.

20 412. In response to Paragraph 412, Intelius states that the Nineteenth Cause
21 of Action against Intelius has been dismissed with prejudice and no answer is
22 necessary.

23 413. In response to Paragraph 413, Intelius states that the Nineteenth Cause
24 of Action against Intelius has been dismissed with prejudice and no answer is
25 necessary.

26 414. In response to Paragraph 414, Intelius states that the Nineteenth Cause
27 of Action against Intelius has been dismissed with prejudice and no answer is
28 necessary.

1 415. In response to Paragraph 415, Intelius states that the Nineteenth Cause
2 of Action against Intelius has been dismissed with prejudice and no answer is
3 necessary.

4 416. In response to Paragraph 416, Intelius states that the Nineteenth Cause
5 of Action against Intelius has been dismissed with prejudice and no answer is
6 necessary.

7 **ANSWER TO ALLEGATIONS RE: TWENTIETH CAUSE OF ACTION**

8 417. In response to Paragraph 417, Intelius states that the Twentieth Cause
9 of Action against Intelius has been dismissed with prejudice and no answer is
10 necessary.

11 418. In response to Paragraph 418, Intelius states that the Twentieth Cause
12 of Action against Intelius has been dismissed with prejudice and no answer is
13 necessary.

14 419. In response to Paragraph 419, Intelius states that the Twentieth Cause
15 of Action against Intelius has been dismissed with prejudice and no answer is
16 necessary.

17 420. In response to Paragraph 420, Intelius states that the Twentieth Cause
18 of Action against Intelius has been dismissed with prejudice and no answer is
19 necessary.

20 421. In response to Paragraph 421, Intelius states that the Twentieth Cause
21 of Action against Intelius has been dismissed with prejudice and no answer is
22 necessary.

23 422. In response to Paragraph 422, Intelius states that the Twentieth Cause
24 of Action against Intelius has been dismissed with prejudice and no answer is
25 necessary.

26 423. In response to Paragraph 423, Intelius states that the Twentieth Cause
27 of Action against Intelius has been dismissed with prejudice and no answer is
28 necessary.

ANSWER TO ALLEGATIONS RE: PRAYER

Intelius denies that Plaintiffs are entitled to the relief sought in the Complaint and Prayer for Relief, or any relief whatsoever, and denies all of the allegations in the Prayer.

AFFIRMATIVE DEFENSES

As separate and distinct affirmative defenses, Intelius states as follows:

FIRST AFFIRMATIVE DEFENSE

(Communications Decency Act—Twelfth through Sixteenth Causes of Action)

The Complaint, and each and every remaining claim for relief against Intelius, fails as a matter of law because Intelius is immune under the Communications Decency Act, 47 U.S.C. § 230, *et. seq.*

SECOND AFFIRMATIVE DEFENSE

(Failure To State A Claim—Twelfth through Sixteenth Causes of Action)

The Complaint, and each and every remaining claim for relief against Intelius, fails to state a claim upon which relief may be granted against Intelius, and further fails to entitle Plaintiffs to the relief sought or to any relief whatsoever against Intelius.

THIRD AFFIRMATIVE DEFENSE

(Lack of Standing—Twelfth through Sixteenth Causes of Action)

Plaintiffs lack standing to bring the Complaint, and each and every remaining claim for relief against Intelius thereof.

FOURTH AFFIRMATIVE DEFENSE

(Laches—Twelfth through Sixteenth Causes of Action)

Plaintiffs are barred from asserting the Complaint, and each and every claim for relief against Intelius, by the doctrine of laches.

FIFTH AFFIRMATIVE DEFENSE

(Waiver—Twelfth through Sixteenth Causes of Action)

Plaintiffs are barred from asserting the Complaint, and each and every claim

1 for relief against Intelius, by the doctrine of waiver.

2 **SIXTH AFFIRMATIVE DEFENSE**

3 (Ratification—Twelfth through Sixteenth Causes of Action)

4 Plaintiffs are barred from asserting the Complaint, and each and every claim
5 for relief against Intelius, by the doctrine of ratification.

6 **SEVENTH AFFIRMATIVE DEFENSE**

7 (Estoppel—Twelfth through Sixteenth Causes of Action)

8 Plaintiffs are barred from asserting the Complaint, and each and every claim
9 for relief against Intelius, by the doctrine of estoppel.

10 **EIGHTH AFFIRMATIVE DEFENSE**

11 (Proximate Cause—Twelfth through Sixteenth Causes of Action)

12 The Complaint, and each and every claim for relief against Intelius, is barred,
13 in whole or in part, because no conduct by or attributable to Intelius was the cause
14 in fact or proximate cause of the damages Plaintiffs seek to recover in this action.

15 **NINTH AFFIRMATIVE DEFENSE**

16 (Conduct of Others—Twelfth through Sixteenth Causes of Action)

17 The Complaint, and each and every claim for relief against Intelius, is barred
18 because if Plaintiffs were injured and damaged as alleged, which is specifically
19 denied, then the injuries and damages were caused, in whole or in part, by the acts
20 or omissions of others, whether individual, corporate, or otherwise, whether named
21 or unnamed in the Complaint, for whose conduct Intelius is not responsible.

22 **TENTH AFFIRMATIVE DEFENSE**

23 (Failure to Mitigate—Twelfth through Sixteenth Causes of Action)

24 The Complaint, and each and every claim for relief against Intelius, is barred
25 in whole or in part because Plaintiffs failed to make reasonable efforts to mitigate
26 such purported injury or damage, which reasonable efforts would have prevented
27 their injury or damages, if any.

28 ///

ELEVENTH AFFIRMATIVE DEFENSE

(First Amendment—Twelfth through Sixteenth Causes of Action)

The Complaint, and each and every claim for relief against Intelius, is barred to the extent that it violates Intelius' rights under the United States and California Constitutions by, among other things, violating Intelius' First Amendment rights of free speech.

TWELFTH AFFIRMATIVE DEFENSE

(Preemption—Twelfth through Sixteenth Causes of Action)

The Complaint, and each and every claim for relief against Intelius, is barred by the doctrine of preemption.

THIRTEENTH AFFIRMATIVE DEFENSE

(Statute of Limitations—Twelfth through Sixteenth Causes of Action)

Plaintiffs are barred from asserting the Complaint, and each and every claim for relief against Intelius, by the applicable statute(s) of limitations.

FOURTEENTH AFFIRMATIVE DEFENSE

(Adequate Remedies at Law— Twelfth through Sixteenth Causes of Action)

Equitable and injunctive relief are barred because Plaintiffs have available remedies at law.

FIFTEENTH AFFIRMATIVE DEFENSE

(Excessive Penalty and Forfeiture— Twelfth through Sixteenth Causes of Action)

The Complaint, and each and every remaining count against Intelius thereof, is barred to the extent that it seeks punitive damages, among other things. Plaintiffs' claims and prayers for relief would constitute an excessive penalty and forfeiture in violation of the Eighth Amendment of the Constitution, federal and state due process rights, applicable statutory provisions, and rules of equity, among other things.

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SIXTEENTH AFFIRMATIVE DEFENSE

(Additional Affirmative Defenses— Twelfth through Sixteenth Causes for Relief)

Intelius hereby gives notice that it intends to rely upon such other affirmative defenses as may become available or apparent during the course of discovery and thus reserves the right to amend this Answer to assert such defenses.

PRAYER FOR RELIEF

WHEREFORE, Intelius prays for the entry of judgment in its favor and against Plaintiffs as follows:

1. That this action be dismissed in its entirety and with prejudice;
2. That Plaintiffs take nothing by way of the Complaint;
3. That Intelius be awarded its attorneys' fees and costs of suit pursuant to 15 U.S.C. § 1681o; and
4. For such other relief as is deemed just and proper.

Dated: November 3, 2011

JONES DAY

By: /s/ John A. Vogt
John A. Vogt

Attorneys for Defendant
INTELIUS INC.